

United States Environmental Protection Agency  
Region 10  
Office of Air Waste and Toxics  
1200 Sixth Avenue  
Seattle, Washington 98101



**AIR POLLUTION CONTROL  
TITLE V PERMIT TO OPERATE**

Permit Number: R10T5-WA-03-01M2

Issue Date: July 2, 2013

Expiration Date: June 9, 2008

Effective Date: July 2, 2013

Replaces Permit No.: R10T5-WA-03-01M1 issued on May 24, 2005 which replaced Permit No. R10T5-WA-03-01 issued June 10, 2003

In accordance with the provisions of Title V of the Clean Air Act and 40 CFR Part 71 and applicable rules and regulations,

Omak Wood Products LLC (Operator)

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit. This source is authorized to operate in the following location:

Colville Reservation  
1100 Eighth Avenue East  
Omak, Washington  
Latitude: 48° 24' 2" Longitude: 119° 31' 6"

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by EPA and citizens under the Clean Air Act. The permit number cited above should be referenced in future correspondence regarding this facility.

Donald Dossett  
Donald Dossett, Manager  
Air Permits and Diesel Unit  
Office of Air Waste and Toxics

July 2, 2013  
Date

## Abbreviations and Acronyms

bf	Board foot (one “board foot” equals lumber that is 12 inches by 12 inches by 1 inch)
Btu	British thermal units
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CAM	Compliance assurance monitoring
CFR	Code of Federal Regulations
CO	Carbon monoxide
EIP	Economic Incentives Programs
EPA	United States Environmental Protection Agency (also U.S. EPA)
gal	Gallon
gr/dscf	Grains per dry standard cubic foot (7,000 grains = 1 pound)
HAP	Hazardous air pollutant
hp	Horsepower
hr	Hour
I.D. No.	Identification number
kg	Kilogram
lb	Pound
m	One thousand
MACT	Maximum Achievable Control Technology
Mg	Megagram
mm	One million
mo	Month
MSDS	Material safety data sheet
msf	Thousand square feet
MVAC	Motor vehicle air conditioner
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOx	Nitrogen oxides
NSPS	New Source Performance Standard
NSR	New source review
PM	Particulate matter
PM10	Particulate matter less than or equal to 10 microns in aerodynamic diameter
ppm	Parts per million
PSD	Prevention of significant deterioration
psia	Pounds per square inch absolute
PTE	Potential to emit
RMP	Risk management plan
SNAP	Significant New Alternatives Program
SO2	Sulfur dioxide
tpy	Tons per year
VOC	Volatile organic compounds

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I. Source Identification

The information in this section is for informational purposes only.

**Company Owner/Mailing Address:** Colville Tribal Federal Corporation  
5515 Birch Street  
Coulee Dam, WA 99116

**Plant Operator/Mailing Address:** Omak Wood Products  
1217 4<sup>th</sup> Ave E, Suite 100  
Olympia, WA 98501

**Plant Location:** 1100 Eighth Avenue East  
Omak, Washington

**County:** Okanogan **EPA Region:** 10

**Reservation:** Colville

**Tribe:** Confederated Tribes of the Colville Reservation

**Operator Contact:** Richard Yarbrough **Phone:** 503-964-0626  
**Title:** President **Fax:**

**Compliance Contact:** Richard Yarbrough **Phone:** 503-964-0626  
**Title:** President **Fax:**

**Responsible Official:** Richard Yarbrough **Phone:** 503-964-0626  
**Title:** President **Fax:**

**Tribal Contact:** Gary Passmore **Phone:** 509-634-2426  
**Title:** Environmental Programs **Fax:** 509-634-2387  
Manager

**AFS Plant Identification Number:** 53-047-00001 **SIC Code:** 2436, 4911 & 2421

**Description of Process:** The facility manufactures green and dry veneer and softwood plywood, produces electricity and dries lumber that is brought to the plant. Byproducts include wood chips and lathed log cores. The raw materials for the plant includes logs, hogged fuel and sawdust.

**Other Clean Air Act Permits:** Non- Title V Operating Permit #R10NT500501

II. Permit Shield

A. Compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements specifically listed in this permit as of the date of permit issuance.

[40 CFR § 71.6(f)(1)(i)]

B. The following requirements have been determined not to apply to this facility as of the date of permit issuance for the reason stated (see statement of basis for more details):

1. 40 CFR part 60, subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, because the boilers were installed before the applicability date of the regulations.

C. Nothing in this permit shall alter or affect the following:

1. The provisions of section 303 of the Clean Air Act (emergency orders), including the authority of the Administrator under that section;
2. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Clean Air Act; or,
4. The ability of the EPA to obtain information under section 114 of the Clean Air Act.

[40 CFR § 71.6(f)(3)]

III. Requirements for Specific Units

A. Veneer Dryers (VD-1 & VD-2) [vented through boilers (RSB-1 & RSB-2) and boiler multiclones and wet scrubbers (WS-1 & WS-2)]

1. Emission & Operational Limitations

- a. Emissions from the boiler wet scrubber stacks (combined) shall not exceed the limits set forth in Table A while the veneer dryers are vented to the boilers' combustion chambers, as determined by the following compliance determination method:

- (1) For each month, the rolling 12-month average emissions shall be determined by calculating the emissions (tons) for each month and adding the emissions (tons) calculated for the previous 11 months;
- (2) Monthly dryer emissions (tons) shall be determined by multiplying the dryer emission factor (lb/msf) by the recorded (see paragraph III.A.3.g) monthly veneer dryer production rate (msf/month) and dividing by 2000 lb/ton;
- (3) The dryer emission factor (lb/msf) shall be the highest of the emission factor shown in Table A or the emission factors determined in any of the following source tests conducted between June 10, 2003 and the last day of the month preceding the month for which emissions are being calculated: Boiler 1 Test Mode C, Boiler 2 Test Mode C, and Boiler 1 Test Mode B plus Boiler 2 Test Mode B; and

**Table A - Veneer dryer emission factors, emission limits and test methods**

<b>Pollutant</b>	<b>Initial Emission Factor (lb/msf<sup>5</sup>)</b>	<b>Annual<sup>4</sup> Emission Limit (tons/year)</b>	<b>Reference Test Method (RM)</b>
PM	0.0263	3.8	RM 5 (40CFR60 Appendix A - PM)
PM10 (including condensable PM10)	0.1013	14.5	RM 202 (40CFR51 Appendix M - condensable PM10) <b>and</b> RM 201 or RM 201A (40CFR51 Appendix M - PM10)
VOC (as THC minus methane <sup>1</sup> plus methanol <sup>2</sup> & formaldehyde <sup>3</sup> )	0.1391	19.9	RM 25A (40CFR60 Appendix A - THC) <b>and</b> RM 18 (40CFR60 Appendix A - methane) <b>and</b> Method 0011 (EPA Publication No. SW-846 - formaldehyde) <b>and</b> Method 308 (40CFR63 Appendix A - methanol)

1 - Measuring and subtracting methane emissions is optional.

2 - Approved alternatives to method 308 include Method 320 (40CFR63 Appendix A); the NCASI Method CI/WP-98.01 (see § 63.14(f)); or the NCASI Method IM/CAN/WP-99.01 (see § 63.14(f)).

3 - Approved alternatives to method 0011 include Method 316 (40CFR63 Appendix A); Method 320 (40CFR63 Appendix A); the NCASI Method CI/WP-98.01 (see § 63.14(f)); or the NCASI Method IM/CAN/WP-99.01 (see § 63.14(f)).

4 - Annual emission limit is on a rolling 12-month basis.

5 - On a 3/8" basis.

- b. All veneer dryer emissions shall be vented to one or both boilers' combustion chambers at all times that veneer dryers operate. The veneer dryer control system bypass shall not be opened at any time that the veneer dryers operate.
- c. The boilers shall be operated at all times that veneer dryer emissions are vented to the boilers' combustion chambers. An electrical interlock (veneer dryer lockout) must be installed and maintained such that the veneer dryers can not be operated unless at least one boiler is operating.
- d. The boiler multiclones and wet scrubbers shall be operated at all times that the boilers operate.
- e. The boilers, veneer dryers and boiler multiclone and wet scrubbers shall be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions at all times. Good air pollution control practices include, but are not limited to, maintaining the veneer dryer door seals to minimize emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available which may include, but is not limited to, testing and monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.
- f. The total hourly production rate of either veneer dryer shall not exceed 16,320 sf/hour, 3/8" basis. Any physical change or change in the method of operation of the facility necessary to realize this production rate may be subject to

additional permitting requirements.

- g. At any time that the veneer dryers are vented to the boilers' combustion chambers, the 6-minute average opacity from the boiler wet scrubbers' stacks shall not exceed 5 percentage points added to the average opacity recorded during the most recent PM and PM10 emission testing as determined using Reference Method 9 (40 CFR 60 App A).
- h. At any time that the veneer dryers are vented to a boiler's combustion chambers, the oxygen in the boiler exhaust (instantaneous reading) shall not be less than the lowest oxygen level recorded during any of the facility's VOC, PM or PM10 emission testing for that emission unit, where the test demonstrated compliance with the applicable emission limits for each of the three pollutants and in each test run.
- i. At any time that the veneer dryers are vented to a boiler's combustion chambers, the temperature of the boiler exhaust (instantaneous reading) shall not be less than the lowest temperature recorded during any of the facility's VOC, PM, or PM10 emission testing for that emission unit, where the test demonstrated compliance with the applicable emission limits for each of the three pollutants and in each test run.
- j. At any time that the veneer dryers are vented to a boiler's combustion chambers, the pressure drop across the boiler wet scrubber shall not be less than the lowest pressure drop recorded during any of the facility's PM and PM10 emission testing for the emission unit, where the test demonstrated compliance with the applicable emission limits for each of the two pollutants and in each test run.
- k. Not later than 45 days after completion of each emission test required under paragraph III.A.2, or other emission test required by EPA, the permittee shall submit to EPA a request for a minor permit modification [see 40 CFR 71.7(e)(1) and paragraph XII.C] to incorporate into the permit, the operational limits determined through the most recent emission testing, specified in paragraphs III.A.1.f through III.A.1.j. The permittee shall comply with the operational limits specified in the request for minor permit modification immediately upon submission of the request.

[section 304(f)(4) of the CAA and 40 CFR § 71.6(b)]

## 2. Testing Requirements

- a. Within 60 days of achieving normal operating rates, but no more than 180 days after beginning operation of the veneer dryers, emissions from the veneer dryers and boilers shall be tested as described below:
  - (1) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rates and the veneer dryers are not vented to the boiler being tested (referred to as Test Mode A).
  - (2) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rates and the veneer dryers are operating at their maximum operating rates and the veneer dryers' emissions are venting to the boilers (with no less than 45% of the dryer emission venting to each boiler) (referred to as Test Mode B).
  - (3) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC)

- while the boilers are running at their normal operating rates and the veneer dryers are operating at their maximum operating rates and all of the veneer dryers' emissions are venting to the boiler that is being tested (referred to as Test Mode C).
- (4) The average boiler steam production rate measured during the emission testing required by paragraph III.A.2.a(1) shall not exceed the average steam production rate measured during the emission testing required by paragraphs III.A.2.a(2) and III.A.2.a(3).
- b. No later than June 30, 2005, emissions from the veneer dryers and boilers shall be tested as described below:
- (1) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rate and the veneer dryers are not vented to it (referred to as Test Mode A).
  - (2) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rates and the veneer dryers are operating at their maximum operating rates and the veneer dryers' emissions are venting to the boilers (with no less than 45% of the dryer emission venting to each boiler) (referred to as Test Mode B).
  - (3) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rates and the veneer dryers are operating at their maximum operating rates and all of the veneer dryers' emissions are venting to the boiler that is being tested (referred to as Test Mode C).
  - (4) The average boiler steam production rate measured during the emission testing required by paragraph III.A.2.b(1) shall not exceed the average steam production rate measured during the emission testing required by paragraphs III.A.2.b(2) and III.A.2.b(3).
- c. No later than July 31, 2006, but no earlier than April 30, 2006, emissions from the veneer dryers and boilers shall be tested as described below:
- (1) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rate and the veneer dryers are not vented to it (referred to as Test Mode A).
  - (2) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rates and the veneer dryers are operating at their maximum operating rates and the veneer dryers' emissions are venting to the boilers (with no less than 45% of the dryer emission venting to each boiler) (referred to as Test Mode B).
  - (3) Test each boiler wet scrubber stack emissions (lb/hr for PM, PM10, VOC) while the boilers are running at their normal operating rates and the veneer dryers are operating at their maximum operating rates and all of the veneer dryers' emissions are venting to the boiler that is being tested (referred to as Test Mode C).
  - (4) The average boiler steam production rate measured during the emission testing required by paragraph III.A.2.c(1) shall not exceed the average steam production rate measured during the emission testing required by paragraphs III.A.2.c(2) and III.A.2.c(3).

- d. During each test run required by paragraph III.A.2, the following parameters shall be monitored and recorded:
  - (1) The opacity (%), recorded during and for the duration of each test run using Reference Method 9 (40 CFR 60, Appendix A).
  - (2) The opacity (%), recorded for the duration of each test run by the continuous opacity monitoring system installed upstream of the wet scrubber.
  - (3) The hogged fuel moisture content (% dry basis) and ash (%) content using ASTM methods and based on a composite sample taken during each emission test period and taken from the feed system to the boilers. Estimate the amount of sawdust mixed in with each sample.
  - (4) The production rates for each boiler (mlb steam) and each veneer dryer (msf veneer), including the veneer redry rate (%) and wood specie dried for each dryer, for the duration of each test run.
  - (5) Any leakage from the veneer dryers, the ducting from the veneer dryers to the boilers, or the control system bypass based on visual observations at the beginning and end of each test run.
- e. No later than December 31, 2007, but no earlier than August 1, 2007, emissions from the veneer dryers and boilers shall be tested as specified by paragraphs III.A.2.a and III.A.2.d.

[40 CFR §§ 71.6(a)(3)(i)(B) and (C); 71.6(a)(3)(ii); 71.6(c)(1)]

- 3. Monitoring and Recordkeeping Requirements
  - a. The permittee shall install, calibrate, operate and maintain any equipment necessary to achieve the monitoring specified in paragraph III.A.3.
  - b. At all times that the boilers operate, the oxygen levels (%) in each boiler's exhaust shall be monitored continuously and recorded hourly. An alarm indicating oxygen levels outside of the range set by paragraph III.A.1.h shall be operated at all times and recorded when triggered.
  - c. At all times that the boilers operate, the temperature (°C) in each boiler's exhaust shall be monitored continuously and recorded continuously on a circular chart.
  - d. At all times that the boilers operate, the pressure drop (inches of water) across each boiler wet scrubber shall be monitored continuously and recorded hourly.
  - e. At all times that the boilers operate, the pressure drop (inches of water) across each boiler multiclone shall be monitored continuously and recorded hourly.
  - f. At all times that the boilers operate, the boiler steam production rate (mlb/hr) shall be monitored continuously and recorded continuously on a circular chart.
  - g. At all times that the veneer dryers operate, the daily dry veneer production rate (msf/hr) and daily hours of operation for each dryer shall be monitored and recorded daily.
  - h. At all times that the veneer dryers operate, the specie of wood (% by specie) dried in each veneer dryer shall be monitored and recorded hourly.
  - i. Each day that the boilers operate, grate cleaning activities (starting and ending times) for each boiler shall be recorded.
  - j. Once each week, the veneer dryers, the ducting from the dryers to the boilers, and the control system bypass shall be inspected for leakage, recording where

- and day, time and duration that any leakage is observed.
- k. Once each month during which the boilers operate for any period of time, the 6-minute average opacity (%) from each boiler wet scrubber stack shall be observed and recorded for at least 60 minutes using Reference Method 9.
  - l. The date, time and duration during which the dryer control system bypass is open while a veneer dryer is operating shall be contemporaneously recorded.  
[40 CFR §§ 71.6(a)(3)(i)(B) and (C); 71.6(a)(3)(ii); 71.6(c)(1)]
4. Reporting Requirements
- a. Reserved.
  - b. Test reports should be submitted pursuant to paragraph VII.A.5 and VII.A.6. Include with each test report, dryer emission factors as determined by the following techniques for each test mode:
    - (1) Dryer emission factor when venting to two boilers. Calculate the “average dryer contribution” (lb/hr) to the boiler emissions by subtracting the average boiler wet scrubber emission rate (lb/hr) measured in Test Mode A from the average boiler wet scrubber emission rate (lb/hr) measured in Test Mode B. Determine the dryer emission factor (lb/msf 3/8" veneer) by dividing the calculated “average dryer contribution” (lb/hr) by the average dryer production rate (msf/hr 3/8" veneer) measured during the test in Test Mode B.
    - (2) Dryer emission factor when venting to one boiler. Determine the “average dryer contribution” (lb/hr) to the boiler emissions by subtracting the average boiler wet scrubber emission rate (lb/hr) measured in Test Mode A from the average boiler wet scrubber emission rate (lb/hr) measured in Test Mode C. Determine the dryer emission factor (lb/msf 3/8" veneer) by dividing the calculated “average dryer contribution” (lb/hr) by the average dryer production rate (msf/hr 3/8" veneer) measured during the test in Test Mode C.

[40 CFR §§ 71.6(a)(3)(i)(B) and (C); 71.6(a)(3)(ii); 71.6(c)(1)]

#### IV. Facility-Wide Requirements

- A. Conditions in section IV of the permit apply to the facility as a whole.
- B. Chemical Accident Prevention Program - The permittee shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR part 68 no later than the latest of the following dates:
  1. Three years after the date on which a regulated substance, present above the threshold quantity in a process, is first listed under 40 CFR § 68.130; or,
  2. The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR § 68.10]
- C. Stratospheric Ozone and Climate Protection
  1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, subpart F, except as provided for motor vehicle air conditioners (MVACs) in 40 CFR part 82, subpart B:
    - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR § 82.156.
    - b. Equipment used during the maintenance, service, repair, or disposal of

appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR § 82.161.
- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR § 82.166. ("MVAC-like appliance" is defined at 40 CFR § 82.152.)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR § 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR § 82.166.

[40 CFR part 82, subpart F]

- 2. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee must comply with all the applicable requirements as specified in 40 CFR part 82, subpart B, Servicing of Motor Vehicle Air Conditioners.

[40 CFR part 82, subpart B]

#### D. Asbestos Removal and Disposal

- 1. The permittee shall comply with 40 CFR part 61, subpart M when conducting any renovation or demolition at the facility.

[40 CFR part 61, subpart M]

### V. General Testing Requirements

A. In addition to the specific testing requirements contained in this permit (see Section III), the permittee shall comply with the following generally applicable testing requirements whenever conducting a performance test required by this permit unless specifically stated otherwise in this permit:

- 1. Submit to EPA a source test plan 45 days prior to any required testing. The source test plan shall include and address the following elements:
  - a. Purpose and scope of testing;
  - b. Source description, including a description of the operating scenarios and mode of operation during testing and including fuel sampling and analysis procedures;
  - c. Schedule/Dates of testing;
  - d. Process data to be collected during the test and reported with the results, including source-specific data identified in section III;
  - e. Sampling and analysis procedures, specifically requesting approval for any proposed alternatives to the reference test methods, and addressing minimum test length (e.g., one hour, 8 hours, 24 hours, etc.) and minimum sample volume;
  - f. Sampling location description and compliance with the reference test methods;
  - g. Analysis procedures and laboratory identification;
  - h. Quality assurance plan;

- i. Calibration procedures and frequency;
  - j. Sample recovery and field documentation;
  - k. Chain of custody procedures;
  - l. QA/QC project flow chart;
  - m. Data processing and reporting;
  - n. Description of data handling and QC procedures;
  - o. Report content and timing.
2. Unless EPA determines in writing that other operating conditions are representative of normal operations or unless specified in section III, the source shall be operated at a capacity of at least 90% but no more than 110% of maximum during all tests.
  3. Only regular operating staff may adjust the processes or emission control devices during or within 2 hours prior to the start of a source test. Any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
  4. For the duration of each test run (unless otherwise specified), the permittee shall record the following information:
    - a. All data which is required to be monitored in section III during the test;
    - b. All continuous monitoring system data which is required to be routinely monitored in sections III and VI for the emission unit being tested.
  5. Each source test shall follow the reference test methods specified by this permit and consist of at least three (3) valid test runs. Alternatives to the reference test methods specified in section III, other than approved alternatives noted in that section, must be requested in writing, 30 days prior to testing, and approved by EPA in writing prior to testing.
  6. Facilities for performing and observing the emission testing shall be provided that meet the requirements of 40 CFR 60.8(e) and Reference Method 1 (40CFR60 Appendix A).

[40 CFR §§ 71.6(a)(3)(i), 40 CFR §§ 71.6(c)(1)]

#### VI. General Recordkeeping Requirements

A. In addition to the specific recordkeeping requirements contained in this permit, the permittee shall comply with the following generally applicable recordkeeping requirements:

1. The permittee shall keep records of required monitoring information that include the following:
  - a. The date, place, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and,
  - f. The operating conditions as existing at the time of sampling or measurement.

[40 CFR § 71.6(a)(3)(ii)(A)]

2. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous

monitoring instrumentation, and copies of all reports required by this permit.

[40 CFR § 71.6(a)(3)(ii)(B)]

VII. General Reporting Requirements

A. In addition to the specific reporting requirements contained in this permit, the permittee shall comply with the following generally applicable reporting requirements:

1. The permittee shall submit to EPA reports of any required monitoring for each six month reporting period from July 1 to December 31 and from January 1 to June 30, except that the first reporting period shall begin on the effective date of this permit and end on December 31. All reports shall be submitted to EPA and shall be postmarked by the 30th day following the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with paragraph VII.B.

[40 CFR § 71.6(a)(3)(iii)(A)]

2. The permittee shall promptly report to EPA, by telephone or facsimile, deviations from permit conditions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. For the purposes of section VII of the permit, prompt is defined as follows:
  - a. Any definition of prompt or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit.
  - b. Where the underlying applicable requirement fails to address the timeframe for reporting deviations, reports of deviations will be submitted based on the following schedule:
    - (1) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
    - (2) For emissions of any regulated pollutant excluding those listed in paragraph VII.A.2.b(1) above, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours of the occurrence.
    - (3) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report required in paragraph VII.A.1.

[40 CFR § 71.6(a)(3)(iii)(B)]

3. For the purposes of paragraph VII.A.2 above, the permittee shall report deviations using the following numbers:

Telephone: (206) 553-1505

Facsimile: (206) 553-0110

Attn: Part 71 Deviation Report

[40 CFR § 71.6(a)(3)(iii)(B)]

4. Within 10 working days of the occurrence of a deviation as provided in paragraph VII.A.2 above, the permittee shall also submit a written notice to EPA, certified consistent with paragraph VII.B. of this permit.

[40 CFR § 71.6(a)(3)(iii)(B)]

- a. For the purposes of section VII of this permit, deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or record keeping required by this permit. For a situation lasting more than 24 hours, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
  - (1) A situation when emissions exceed an emission limitation or standard;
  - (2) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met;
  - (3) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit;
  - (4) A situation where any testing, monitoring, recordkeeping or reporting required by this permit is not performed or not performed as required; and,
  - (5) A situation in which an exceedance or an excursion, as defined in 40 CFR Part 64, occurs.

[40 CFR § 71.6(a)(3)(iii)(C)]

5. Source test emission data shall be reported as the arithmetic average of all valid test runs and in the terms of any applicable emission limit, unless otherwise specified in section III.

[40 CFR §§ 71.6(a)(3)(iii), 40 CFR §§ 71.6(c)(1)]

6. EPA shall be notified of any delay to the emission testing schedule as soon as possible.

[40 CFR §§ 71.6(a)(3)(iii), 40 CFR §§ 71.6(c)(1)]

7. Emission test reports shall be submitted to EPA within 60 days of completing any emission test required by this permit along with items required to be recorded in paragraph V.A.4 above.

[40 CFR §§ 71.6(a)(3)(iii), 40 CFR §§ 71.6(c)(1)]

#### B. Document Certification

1. Any document required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[40 CFR § 71.5(d), § 71.6(c)(1) and § 71.9(h)(2)]

2. Any documents required to be submitted under this permit, including reports, test data, monitoring data, notifications, compliance certifications, fee calculation worksheets, and applications for renewals and permit modifications shall be submitted to:

Part 71 Air Quality Permits  
U.S. EPA - Region 10, OAWT 107  
1200 Sixth Avenue  
Seattle, WA 98101

[40 CFR § 71.5(d), § 71.6(c)(1) and § 71.9(h)(2)]

### VIII. Compliance Requirements

#### A. Compliance with the Permit

1. The permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal.

[40 CFR § 71.6(a)(6)(i)]

2. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

[40 CFR § 71.6(a)(6)(ii)]

3. For the purpose of submitting compliance certifications in accordance with paragraph VIII.B. of this permit, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[section 113(a) and 113(e)(1) of the CAA, 40 CFR § 51.212, § 52.12, § 52.33, § 60.11(g), and § 61.12.]

#### B. Compliance Certification

1. The permittee shall submit to EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by January 30 of each year and covering the previous calendar year except that the first certification shall cover the period from the effective date of this permit through December 31. The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with paragraph VII.B of this permit.

[40 CFR § 71.6(c)(5)]

2. The certification shall include the following:

- a. The identification of each permit term or condition that is the basis of the certification.
- b. The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information.
- c. The status of compliance with each term and condition of the permit for the period covered by the certification, based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification.
- d. Whether compliance with each permit term was continuous or intermittent.

[40 CFR § 71.6(c)(5)(iii)]

#### C. Emergency Provisions

1. In addition to any emergency or upset provision contained in any applicable

requirement, the permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and,
- d. The permittee submitted notice of the emergency to EPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements of paragraph VII.A.2 of this permit, concerning prompt notification of deviations.

[40 CFR § 71.6(g)]

2. In any enforcement proceeding the permittee attempting to establish the occurrence of an emergency has the burden of proof.

[40 CFR § 71.6(g)]

3. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

[40 CFR § 71.6(g)]

#### D. Compliance Schedule

1. For applicable requirements with which the source is in compliance, the permittee will continue to comply with such requirements.

[40 CFR § 71.6(c)(3) and § 71.5(c)(8)(iii)(A)]

2. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis.

[40 CFR § 71.6(c)(3) and § 71.5(c)(8)(iii)(B)]

### IX. Payment of Fees

- A. The permittee shall pay an annual permit fee in accordance with the procedures outlined below.

[40 CFR § 71.9(a)]

- B. No later than November 15 of each year, the permittee shall submit full payment of the annual permit fee for the preceding calendar year.

[40 CFR § 71.9(h)]

- C. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the

order of the U.S. Environmental Protection Agency.

[40 CFR § 71.9(k)(1)]

- D. The permittee shall send fee payment and a completed fee filing form to:

Mellon Bank  
U. S. EPA Region 10  
P. O. Box 360903M  
Pittsburgh, PA 15251

[40 CFR § 71.9(k)(2)]

- E. The permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by November 15 of each year to the address listed in paragraph VII.B.2 of this permit.<sup>1</sup>

[40 CFR § 71.9(h)(1)]

- F. Basis for calculating annual fee:

1. The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all “regulated pollutants (for fee calculation)”<sup>2</sup> emitted from the source by the presumptive emission fee <sup>3</sup> (in dollars/ton) in effect at the time of calculation.

[40 CFR § 71.9(c)(1)]

2. “Actual emissions” means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation), as defined in 40 CFR § 71.2, emitted from a part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit’s actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.

[40 CFR § 71.9(c)(6)]

3. Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.

[40 CFR § 71.9(h)(3)]

4. If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures.

[40 CFR § 71.9(e)(2)]

5. The permittee shall exclude the following emissions from the calculation of fees:
  - a. The amount of actual emissions of each regulated pollutant (for fee calculation)

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<sup>1</sup>The permittee should note that an annual emissions report (see permit condition VIII), required at the same time as the fee calculation worksheet by 40 CFR § 71.9(h), has been incorporated into the fee calculation worksheet form which is available from EPA’s website at: <http://www.epa.gov/airprog/oar/oaqps/permits/p71forms.html>

<sup>2</sup>The term “regulated pollutant (for fee calculation)” is defined in 40 CFR § 71.2.

<sup>3</sup>The presumptive emission fee (per ton fee) amount is revised each calendar year to account for inflation and is available from EPA prior to the start of each calendar year.

that the source emits in excess of 4,000 tons per year;

[40 CFR § 71.9(c)(5)(i)]

- b. Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and

[40 CFR § 71.9(c)(5)(ii)]

- c. The insignificant quantities of actual emissions not required to be listed or calculated in a permit application pursuant to 40 CFR 71.5(c)(11).

[40 CFR § 71.9(c)(5)(iii)]

6. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official in accordance with paragraph VII.B of this permit.<sup>4</sup>

[40 CFR § 71.9(h)(2)]

7. The permittee shall retain in accordance with the provisions of paragraph VI.A.2 of this permit, all work sheets and other materials used to determine fee payments. Records shall be retained for five years following the year in which the emissions data is submitted.

[40 CFR § 71.9(i)]

8. Failure of the permittee to pay fees in a timely manner shall subject the permittee to assessment of penalties and interest in accordance with 40 CFR § 71.9(l).

[40 CFR § 71.9(l)]

9. The permittee, when notified by EPA of additional amounts due, shall remit full payment within 30 days of receipt of an invoice from EPA.

[40 CFR § 71.9(j)(2)]

10. If the permittee thinks an EPA assessed fee is in error and wishes to challenge such fee, the permittee shall provide a written explanation of the alleged error to EPA along with full payment of the EPA assessed fee.

[40 CFR § 71.9(j)(3)]

X. Annual Emissions Inventory

- A. The permittee shall submit an annual emissions report of its actual emissions for the preceding calendar year. The annual emissions report shall be certified by a responsible official and shall be submitted each year to EPA by November 15 of each year. The annual emissions report shall be submitted to EPA at the address listed in paragraph VII.B.2 of this permit.<sup>5</sup>

[40 CFR § 71.9(h)(1) and (2)]

XI. Standard Terms and Conditions

A. Duty to Provide and Supplement Information

1. The permittee shall furnish to EPA, within a reasonable time, any information that

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<sup>4</sup>The permittee should note that the fee calculation worksheet form incorporates a section that includes this requirement.

<sup>5</sup>The permittee should note that an annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR § 71.9(h), has been incorporated into the fee calculation worksheet.

EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR part 2, subpart B.

[40 CFR § 71.6(a)(6)(v), § 71.5(a)(3)]

2. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information.

[40 CFR § 71.5(b)]

**B. Severability Clause**

1. The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

[40 CFR § 71.6(a)(5)]

**C. Property Rights**

1. This permit does not convey any property rights of any sort, or any exclusive privilege.

[40 CFR § 71.6(a)(6)(iv)]

**D. Inspection and Entry**

1. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow EPA or an authorized representative to perform the following:
  - a. Enter upon the permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. As authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

[40 CFR § 71.6(c)(2)]

**XII. Permit Changes**

**A. Permit Actions**

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[40 CFR § 71.6(a)(6)(iii)]

**B. Permit Revisions**

1. Revisions to the permit may be requested and will be processed in accordance with the provisions for administrative permit amendments (40 CFR 71.7(d)); minor permit modifications (40 CFR 71.7(e)(1) and (2)); and significant permit modifications (40 CFR 71.7(e)(3)).

[40 CFR § 71.7(d), 40 CFR § 71.7(e)]

C. Reserved.

D. Reserved.

E. Reserved

F. Reopening for Cause

1. The permit may be reopened by EPA and the permit revised prior to expiration under any of the following circumstances:
  - a. Additional applicable requirements under the Act become applicable to a major part 71 source with a remaining permit term of 3 or more years.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - c. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[40 CFR § 71.7(f)]

G. Off Permit Changes

1. The permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met:
  - a. Each change is not addressed or prohibited by this permit.
  - b. Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
  - c. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the Clean Air Act.
  - d. The permittee must provide contemporaneous written notice to EPA of each change, except for changes that qualify as insignificant activities under 40 CFR § 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
  - e. The permit shield does not apply to changes made under this provision.
  - f. The permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those

changes.

[40 CFR §71.6(a)(12)]

#### H. Emissions Trading and Operational Flexibility

1. The permittee is allowed to make a limited class of changes under section 502(b)(10) of the Clean Air Act within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions) and are not Title I modifications. This class of changes does not include:
  - a. Changes that would violate applicable requirements; or
  - b. Changes that would contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[40 CFR § 71.6(a)(13)(i)]

2. The permittee is required to send a notice to EPA at least 7 days in advance of any change made under this provision. The notice must describe the change, when it will occur and any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy this permit.

[40 CFR § 71.6(a)(13)(i)(A)]

3. Any permit shield provided under 40 CFR § 71.6(f) does not apply to changes made under this provision.

[40 CFR § 71.6(a)(13)(i)(B)]

#### I. Permit Expiration and Renewal

1. This permit shall expire upon the earlier occurrence of the following events:
  - a. The expiration date indicated on page one of this permit; or
  - b. The source is issued a part 70 or part 71 permit by the Colville Confederated Tribes under an EPA approved or delegated permit program.

[40 CFR § 71.6(a) (11)]

2. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted at least six months, but not more than 18 months, prior to the date of expiration of this permit.

[40 CFR § 71.5(a)(1)(iii)]

3. If the permittee submits a timely and complete permit application for renewal, consistent with 40 CFR § 71.5(a)(2), but EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR § 71.6(f) shall remain in effect until the renewal permit has been issued or denied. This permit shield shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by EPA.

[40 CFR § 71.7(c)(3), § 71.7(b)]

4. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State, and tribal review.

[40 CFR § 71.7(c)(1)]

5. The application to EPA for renewal shall include the current permit number, a

description of permit revisions and off-permit changes that occurred during the permit term and were not incorporated into the permit during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

[40 CFR § 71.5(a)(2) and § 71.5(c)(5)]

**Air Pollution Control  
Title V Permit to Operate  
Statement of Basis for Administratively Amended Permit No.  
R10T5-WA-03-01M2  
July 2, 2013**

**Omak Wood Products LLC  
Colville Reservation  
Omak, Washington**

Pursuant to the requirements of 40 CFR 71.11(b), this statement of basis serves to describe the bases for the changes to permit conditions from the prior Title V permit to operate issued on May 24, 2005. This permit action was initiated in response to a request, received on May 31, 2013, from the applicant for an administrative amendment, pursuant to 40 CFR 71.7(d). This statement of basis only addresses the name change of the operator/permittee (Omak Wood Products LLC) and company contact and responsible official (Richard Yarbrough, President).

The facility is owned by the Colville Tribal Federal Corporation (CTFC). Omak Wood Products LLC will be the operator and permittee based on the written agreement between CTFC and Omak Wood Products LLC. The specific date of the transfer of responsibility is March 21, 2013. The permit lists the contact information for Omak Wood Products LLC and the new responsible official.

This operating permit was originally issued on June 10, 2003, and significantly modified on May 24, 2005. The legal and factual bases for the unchanged permit conditions remain as documented in the prior statements of basis issued on June 10, 2003, and May 24, 2005, which are incorporated as an Appendix to this State of Basis.

**Statement of Basis Appendix  
Omak Wood Products LLC  
July 2, 2013**

**Air Pollution Control  
Title V Permit to Operate  
Statement of Basis for Modified Permit No. R10T5-WA-03-01M1  
May 23, 2005**

**Colville Tribal Enterprise Corporation  
dba Colville Indian Power & Veneer  
Colville Reservation  
Omak, Washington**

**1. Purpose of This Statement of Basis**

Pursuant to the requirements of 40 CFR 71.11(b), this statement of basis serves to describe the bases for the changes to permit conditions from the prior Title V permit to operate issued on June 10, 2003. This permit action was initiated in response to a request, received on September 7, 2004, from the applicant for a significant permit modification, pursuant to 40 CFR 71.7(e)(3). This statement of basis only addresses:

- (1) permit conditions that were removed from the prior permit version,
- (2) permit conditions that were added to the prior permit version,
- (3) permit conditions from the prior version that were changed, and
- (4) changes to permit conditions proposed by the applicant in the significant permit modification application that were not accepted as part of this permit action.

The legal and factual bases for the unchanged permit conditions remain as documented in the prior statement of basis issued on June 10, 2003, which is attached as Appendix A.

**2. EPA Authority to Issue Part 71 Permits**

On July 1, 1996 (and updated on February 19, 1999) EPA promulgated regulations codified at 40 CFR Part 71 setting forth the procedures and terms under which EPA would administer a federal operating permit program. As described in 40 CFR 71.4(b), EPA will implement a Part 71 program in areas where a Tribal agency has not developed an approved Part 70 program. The Confederated Tribes of the Colville Reservation (Colville Tribes) is a federally-recognized Indian Tribe, and the reservation is considered to be Indian Country, as defined in 40 CFR Part 71. The Colville Tribes do not have an approved Part 70 program.

**3. Facility Information**

**3.1 Location**

The Colville Indian Power & Veneer (CIPV) facility is located within the boundaries of the Colville Reservation in North-Central Washington. The facility is located at 1100 Eighth Avenue East in Omak, Washington.

### 3.2 Local Air Quality and Attainment Status.

North-Central Washington, including the Colville Reservation, is “unclassifiable” regarding attainment of the national ambient air quality standards for all criteria pollutants. An area is unclassifiable when there is insufficient monitoring data to determine attainment status.

### 3.3 General Description of Operations and Products

CIPV is an operating division of the Colville Tribal Enterprise Corporation, a business enterprise of the Colville Tribes. The facility manufactures green and dry veneer and softwood plywood, produces electricity and dries lumber that is brought to the plant. Byproducts include wood chips and lathed log cores. The raw materials for the plant include logs, hogged fuel and sawdust. The maximum annual plywood production is 360,000 thousand square feet (msf) of 3/8 inch plywood; however, actual production is expected to be closer to 220,000 msf. The facility’s two steam driven turbines combined are capable of producing 12.5 megawatts of electricity. The facility is capable of drying approximately 6 million bf/yr of lumber in 2 dry kilns.

Logs (40% Ponderosa Pine and 60% Larch and Douglas Fir) are brought to the site by truck or train and are scaled, sorted and stored in the log yard. Some logs are sent to other facilities after sorting. The logs enter the process via the log deck, after which they are debarked by two debarkers and cut to length. Scrap ends, or lily pads, are sent to a grinder via conveyor and then conveyed via belt conveyor along with the bark to the hogged-fuel pile to be burned as fuel in two boilers. A number of logs, called blocks, are placed in the log steaming vats to be heated and softened by hot water before being sent to the lathe for peeling into thin sheets of green veneer.

The lathe cores (log centers that cannot be peeled) are sent to storage and sold as a byproduct. The veneer is trimmed and the waste is conveyed with any lathe waste to a chipper and on to the chip storage bin. Material in the chip storage bin is pneumatically conveyed to railcars for shipping as a byproduct. Green veneer is dried in two steam heated dryers and then either shipped as product or glued into layers by the curtain coater which uses phenol-formaldehyde resin. The glued panels are pressed together in two steam heated presses to make rough plywood which is shipped as product. The plywood panels may optionally be cut to size and sanded prior to shipping.

Trucks deliver hogged fuel and sawdust to the plant which is added to the hogged fuel produced on site. The hogged fuel-sawdust mixture is fed to two hogged-fuel fired, Riley-Stoker brand boilers which produce steam to heat the steaming vats, lumber kilns, veneer dryers and presses and to produce electricity in two turbines. The boilers, rated at 150 MMBtu/hr heat input each (130,000 lb/hr steam produced each), do not have any back-up fuel (e.g. gas or oil) capability. Each boiler has a multiclone and wet scrubber for particulate emission control and vent through individual stacks. The plant has one 240 hp diesel-fueled water pump for fighting fires which is only used when needed or being test-run. Other sources of fugitive air emissions include paved and unpaved road traffic, log yard activities, material storage piles and miscellaneous material handling, welding, painting and cleaning activities. There are seven cyclones used for pneumatically handling chips and hogged fuel throughout the plant.

Until the year 2000, the plant also produced green and dry lumber. The plant used steam-heated kilns to dry the green lumber and three direct-fired (sawdust fueled) dryers to dry veneer. The sawmill, kilns (all but two), direct-heated dryers (one still exists but is not operated), a third debarker, plywood finishing saws and sanders and related equipment have been permanently shut down and are not addressed in this permit. Restarting the shutdown emission units and equipment would be subject to review under the Prevention of Significant Deterioration (PSD) program if such restart would increase emissions by the significant thresholds.

The two indirectly-heated veneer dryers were installed in early 2003. The exhaust from these two dryers are ducted together and then sent to the boilers, where they are combusted in the boilers. The boilers serve as control equipment for the dryers. Veneer exhausts can be routed to either one or to both of the boilers.

### 3.4 Emission Units and Emission Generating Activities

Table 3-1 lists the emission units at the facility (additional details are available in the original statement of basis - Appendix A) that are directly impacted by this significant permit modification. In addition to these, the facility includes material handling activities, cyclones on the pneumatic material handling system, a diesel-fired fire-water pump, log debarkers, plywood presses, a veneer trimmer and chipper, log steaming vats, lumber drying kilns, material storage piles, logyard fugitives, fugitives from vehicle traffic, and miscellaneous support activities.

**Table 3-1  
List of Emission Units (EU) Affected by Significant Modification Application**

EU ID #	Emission Unit Description
RSB-1	Wood waste fired boiler #1; Stoker-Riley brand; installed 10/1/74; 150,000 MMBtu/hr input & 130,000 pph steam output capacity; powers turbine #1
RSB-2	Wood waste fired boiler #1; Stoker-Riley brand; installed 6/1/75; 150,000 MMBtu/hr input & 130,000 pph steam output capacity; powers turbine #2
VD-1	Veneer dryer #1; indirect steam heat from boilers; 16,320 (3/8") sf/hr capacity; installed in 2003
VD-2	Veneer dryer #2; indirect steam heat from boilers; 16,320 (3/8") sf/hr capacity; installed in 2003

### 3.5 Permitting and Compliance History

This facility was originally built in the mid-1970s. Prior to 1996, Omak Wood Products owned the facility. In 1996, they added a third dryer to the facility. At that time, the dryers were all direct-fired using sawdust burners. EPA determined in 1997 that the addition of the third dryer constituted a major modification to a major facility and which requires a Prevention of Significant Deterioration (PSD) permit. Omak had not obtained a PSD permit prior to construction, which was a violation of the Clean Air Act. The violation resulted in a Consent

Order which required Omak to install Best Available Control Technology (BACT) for the three dryers. Omak filed for bankruptcy in March, 1997 and in July 1998, sold the facility to Quality Veneer and Lumber (QVL) doing business as Washington Veneer. QVL chose to vent the dryer emissions to the boilers' combustion chambers to meet the BACT requirement in the Consent Order. The new control system was installed and tested by late summer 1999. As required, QVL submitted a Title V operating permit application to EPA in August, 1999. Supplemental operating permit application information was submitted by QVL in January, 2000.

In July, 2000, QVL closed the facility, filing for bankruptcy in October, 2000. CTEC, doing business as CIPV, purchased the facility in December, 2001, and began to operate the power generation equipment in April, 2002. On August 26, 2002, CTEC requested guidance from EPA regarding the installation of two new indirectly-heated dryers that would replace the three direct-fired dryers. On November 25, 2002, CTEC requested emission limits which would allow the new dryers to avoid permitting under the PSD program and submitted an updated Title V operating permit application. Additional information was submitted between January and April, 2003. EPA issued a Title V permit to CIPV on June 10, 2003. In addition to containing all applicable requirements and other terms and conditions required by 40 CFR Part 71, the CIPV permit contained terms and conditions that limit CIPV's potential to emit particulate matter (PM and PM-10) and volatile organic compounds (VOC) from the dryers so that construction and installation of the two dryers would not trigger permitting under the PSD program.

CIPV restarted the veneer drying and plywood processes after issuance of the original Title V permit. On September 17, 2003, CIPV sustained a fire at the facility. In conducting a follow-up investigation, EPA observed and documented violations of the June 10, 2003 Title V permit. EPA issued a Notice of Noncompliance to CTEC (as owner and operator of CIPV) on December 30, 2003. On February 2, 2004, EPA received CIPV's annual compliance certification. The certification indicated that CIPV had not complied with several provisions of the Title V permit. During the week of March 1, 2004, EPA conducted an inspection. On April 2, 2004, EPA issued a second Notice of Noncompliance, for violations of the Title V permit observed and documented between December 30, 2003 and April 1, 2004. CIPV addressed both of these Notices by entering into an Administrative Order on Consent on September 8, 2004. As part of the Administrative Order, CIPV agreed to develop and implement an operation and maintenance plan, and submit a significant permit modification request.

CIPV has stated that they do not intend to operate certain parts of the facility (see Section 3.2 of the original Statement of Basis for more information). Restarting the shutdown emissions units and equipment would be subject to a PSD if such restart increased the emissions by the significant thresholds. CIPV can request an applicability determination by EPA before restarting any shutdown equipment.

There are no historical records in EPA's files regarding plant modifications prior to the modification in 1996. A source seeking a determination of non-applicability of PSD permitting requirements would need to provide EPA with detailed information regarding each change at the facility. For this reason, no enforcement or permit shield is implied or granted for past PSD compliance.

#### **4 Scope of Significant Modification Application**

The September 2, 2004 significant modification application (Appendix B), received by EPA on September 7, 2004, requested four typographical changes and 22 substantive changes to the existing permit to operate. The requested changes are summarized as follow:

##### **Typographical Changes**

1. Revise Condition III.A.1.a(1) to address daily emission rates instead of recalculating daily emission limits;
2. Revise Condition III.A.1.a(2) to address annual emission rates instead of recalculating annual emission limits;
3. Revise Condition III.A.3.g to correct to “monitored” and “recorded;” and
4. Revise Condition XII.I.1.b to identify the Tribe as Colville Confederated Tribes.

##### **Removal of Daily Limits**

5. Remove Condition III.A.1.a(1) as daily production limits are not necessary to maintain compliance with underlying regulatory requirements.

##### **Use of Averaging Period**

6. Revise Condition III.A.1.h to reflect use of an averaging period instead of an instantaneous reading for boiler exhaust oxygen content; and
7. Revise Condition III.A.1.i to reflect use of an averaging period instead of an instantaneous reading for boiler exhaust temperature.

##### **Removal of One-Time Notification Requirement**

8. Remove Condition III.A.4.a as the one-time obligation to notify EPA of the start-up of the veneer dryers has been met.

##### **Removal of Monitoring of Control Equipment**

9. Remove Condition III.A.1.j as monitoring operation of the wet scrubbers are not critical for control of gaseous emissions; and
10. Remove Condition III.A.3.e which requires monitoring of the pressure drop across the multiclones, as these requirements do not demonstrate compliance with any regulatory requirements or protect the region’s air quality.

##### **Provide Operational Flexibility**

11. Revise Condition III.A.2.a(1) to allow dryer operation (and venting to the boiler not being tested) while one of the boilers is being tested on a boiler-only basis.

##### **Remove Conditions Related to Monitoring and Recordkeeping**

12. Remove Condition III.A.1.g as there appears to be no regulatory basis for an opacity standard;
13. Remove Condition III.A.2.d(2) as readings from the continuous opacity monitoring system (COMS) do not demonstrate compliance with any regulatory requirements or protect the region’s air quality;
14. Remove Condition III.A.3.k as there appears to be no regulatory basis for opacity

- monitoring or recordkeeping;
15. Remove requirements relating to veneer redry rate and wood specie from Condition III.A.2.d(4) as they do not demonstrate compliance with any regulatory requirements or protect the region's air quality;
  16. Remove Condition III.A.3.h which requires recording the specie of wood being dried - because this requirement does not demonstrate compliance with any regulatory requirements or protect the region's air quality;
  17. Remove Condition III.A.2.d(3), as monitoring of fuel properties during the source test does not demonstrate compliance with any regulatory requirements or protect the region's air quality;
  18. Remove Condition III.A.3.f as monitoring of boiler steam production is not necessary;
  19. Revise Condition V.A.1.b to address only the fuel sampling and analysis procedures during the operating scenarios and modes of operation during source testing events;

#### Provide Clarification

20. Clarify in Condition V.A.2 which of the tested sources (or both) are required to operate between 90% and 110% of capacity; and
21. For Condition VII.A.2.b(1), clarify the distinction between and applicability of regulations to hazardous air pollutants and toxic air pollutants.

#### Revise Conditions Regarding Boiler Operation

22. Condition III.A.1.d, requiring operation of the multiclones and wet scrubbers;
23. Condition III.A.3.b, which establishes the requirement to monitor and maintain records on the boiler exhaust stack oxygen concentration;
24. Condition III.A.3.c, requiring continuous monitoring of the boiler exhaust stack temperature;
25. Revise Condition III.A.3.d so that the requirement to monitor the pressure drop across the wet scrubbers only applies when the dryers are venting to the boilers. Additionally, CIPV proposes to reduce the frequency of recordkeeping to once every other hour;

#### Remove Throughput Limit

26. Remove Condition III.A.1.f as the source testing demonstrates compliance.

## **5 Review of Significant Permit Modification Application**

### **5.1 Requested Typographical Changes**

The four proposed typographical changes are purely typographical in nature and do not affect emissions or change regulatory applicability. Condition III.A.1.a(1) was removed from the permit as discussed in section 5.2, below. Condition III.A.1.a(2) was folded into Condition III.A.1.a and better describes how compliance with the emission limits shall be determined. Conditions III.A.3.g and XII.I.1.b were revised as requested.

### **5.2 Removal of Daily Limits**

Emission limits for the new, steam-heated veneer dryers were included in the permit at CIPV's request to ensure that emission increases attributable to the project remained below the emission

thresholds that would have required review under the PSD program. As the applicant has noted, daily emission limits are not necessary, and monthly limits are adequate to ensure practical enforceability of the emission limits. Upon further review, it is felt that the rolling 12-month emission limit is adequate to ensure that dryer operations remain below PSD applicability levels.

Consequently, Table A and Condition III.A.1.a(1) have been revised to remove daily emission limits. The annual limits remain unchanged, and must be complied with on a rolling 12-month basis. Table A has also been revised to include the pollutant-specific emission factors that formed the basis of this review. To ensure that the facility enjoys operational flexibility while ensuring that PSD thresholds are not exceeded, the compliance determination method relies on use of the highest emission factor (on a pollutant-specific basis), from Table A or source tests, to calculate monthly and annual, 12-month rolling emissions.

However, this determination is based on the permittee adhering strictly to the required monitoring, recordkeeping and reporting requirements that demonstrate that these emission units (i.e. the dryers) and their controls (i.e. the boilers) are operated exactly as specified in this permit. Failure to comply with the requirements of Permit Condition III.A could result in the reopening of this permit to include provisions with shorter averaging periods.

### 5.3 Use of Averaging Period

Condition III.A.1.h and Condition III.A.1.i in the original permit limit an instantaneous reading to the lowest value of boiler exhaust oxygen content or temperature recorded during the most recent source test. The applicant has requested that for both of these parameters, compliance be determined based on a six-minute average rather than an instantaneous reading. The rationale for this request of these requirements is that either parameter could sustain very short-lived fluctuations that fall below the limits, but that the limited duration of the fluctuation would likely not affect emission rates.

In establishing this condition, the potential for short-term fluctuations was recognized. That is why the condition requires that the monitored parameter remain above the lowest instantaneous value that demonstrated compliance. However, the intent of this condition can be equivalently served by comparing ongoing six-minute average readings with six-minute averages measured during source tests. EPA was prepared to make this change, with an attendant change in recordkeeping to require recording of six-minute averages. However, when EPA enquired about the facility's ability to record six-minute average data, Geomatrix Consultants (CIPV's consultant) indicated that CIPV did not have monitoring equipment capable of recording six-minute average data. In a January 2005 phone call, Geomatrix Consultants withdrew the original request to replace instantaneous readings with six-minute average readings. As a result, this change has not been made in the revised permit.

The applicant has also requested that for both of these exhaust parameters, the threshold limit be based on the lowest temperature recorded during a source test where compliance was demonstrated. Since monthly emissions will be calculated using the highest factors, this request is acceptable provided that the data used be from tests where compliance is demonstrated for all runs and for all pollutants (i.e. PM, PM10 and VOC). Oxygen content and temperature data from

a test where only one or two of the pollutants of interest were tested may not be used to develop the lower limit. This revised approach provides for flexibility while ensuring that only appropriate test data is used to set the limit. Data can only be used for the emission unit (i.e. boiler) from which the data was collected during a source test. Condition III.A.1.h and Condition III.A.1.i have been revised to accommodate this request.

#### 5.4 Removal of One-Time Notification Requirement

Condition III.A.4.a requires the permittee to notify EPA of the startup of each veneer dryer. Both dryers are now operational and the period for notification has passed. This condition can be considered obsolete, and can be removed from the permit. Although this condition has been removed, the original numbering system is left in place to minimize confusion in compliance activities. Instead, the term “reserved” has been used to reflect that the condition has been removed.

#### 5.5 Removal of Monitoring of Control Equipment

In the existing permit, Condition III.A.1.j requires the permittee to ensure that the pressure drop across the wet scrubber shall not be less than the lowest pressure drop recorded during the most recent source test. In addition, Condition III.A.3.e requires monitoring of the pressure drop across the multiclones. CIPV claims that due to the gaseous nature of the veneer dryer exhaust, it is unlikely that burning it in the boilers’ combustion chambers generates large quantities of particulate matter. Furthermore, the applicant states that it is unlikely that the wet scrubbers are providing much, if any, control of the dryers’ emissions.

However, it is well documented that veneer dryer exhausts contain organic material that can condense to form particulate matter. EPA believes that the multiclones and wet scrubbers are contributing to control of uncombusted dryer exhaust emissions. Furthermore, a key component of CIPV’s compliance strategy, the source test, is conducted downstream of the multiclones and wet scrubbers, and while they are operating. The compliance tests rely on the operation of the multiclones and scrubbers to demonstrate compliance with the emission limits. Therefore, CIPV is required to document that the boiler, with multiclones and scrubbers are operated in the same manner in between source tests. These permit conditions were not removed from the permit. However, Condition III.A.1.j has been revised to be consistent with the format of Conditions III.A.1.h and i.

#### 5.6 Provide Operational Flexibility

Condition III.A.2.a(1) contains the requirements for testing of each boiler while veneer dryers are not operating. The applicant has asked that the condition be revised to provide the same flexibility as in Conditions III.A.2.b(1) and III.A.2.c(1), where non-operation of the dryers is not required - instead the conditions require that the dryer exhaust be directed to the boiler that is not being tested at the time. This request can be accommodated without affecting the intent of this testing condition, and so the permit has been revised accordingly.

#### 5.7 Remove Conditions Related to Monitoring and Recordkeeping

The applicant has requested removal of Condition III.A.1.g, Condition III.A.2.d(2) and

Condition III.A.3.k because CIPV asserts that there is no regulatory basis for an opacity standard. EPA disagrees that there is no regulatory basis for an opacity standard and related monitoring and recordkeeping requirements and that such requirements do not serve to protect the region's air quality. This Title V permit contains limits to ensure that installation of the new veneer dryers results in a PTE below the thresholds where the PSD program would apply. As noted earlier, emissions from veneer dryers often result in coalesced organic material that is visible.

Observation of visible emissions from the boiler stacks, while the dryers are vented to them, are an indication that dryer emissions are not adequately controlled. Although source testing provides a one-time snapshot of compliance with the emission limits at the time of the test, it is appropriate that the permit include monitoring of parameters, such as opacity, that ensures that, on an ongoing basis, the control equipment and emissions unit is operating in the same manner as it was operating during a complying source test. Monitoring of opacity is commonly included in permits as a means of ensuring that control equipment used to comply with PM and PM10 limits is being properly operated and maintained. Therefore, EPA continues to believe that the opacity conditions constitute appropriate monitoring for the emissions limit in the permit.

The applicant also requested revision of Condition III.A.2.d(4) and removal of Condition of III.A.3.h to remove the requirement to monitor veneer redry rate and wood specie being dried. The underlying technical analyses and operational/emission limits are based on assumptions regarding veneer dryer throughput. It is appropriate, therefore, to monitor dryer throughput. Although source testing provides a one-time snapshot of compliance with the emission limits at the time of the test, it is appropriate that the permit include monitoring of parameters, such as redry rate and wood specie being dried, that ensures that, on an ongoing basis, the source is being operated in the same manner as it was operating during a complying source test.

For the same reasons discussed above, the revisions proposed by the applicant regarding Condition III.A.2.d(3) (monitoring of fuel properties during the source test), Condition III.A.3.f (monitoring of boiler steam production) and Condition V.A.1.b (fuel sampling and analysis procedures during the operating scenarios and modes of operation during source testing events) are not incorporated into the revised permit.

## 5.8 Provide Clarification

The applicant has requested clarification of Condition V.A.2 to indicate which of the tested sources (veneer dryers or boilers) or both, are required to operate between 90% and 110% of capacity. This condition is a standard condition that applies to all emission units being tested. The underlying intent is to ensure that test conditions are in fact representative of the emission unit's maximum emission rate. In this case, the primary interest is to characterize emissions from the veneer dryers, to ensure that maximum emissions from these emission units remain below the PSD applicability thresholds.

In this case, as allowed by the permit condition in question, EPA may determine that other operating conditions are representative of normal operations. EPA's determination on such operating conditions may readily be solicited by timely and complete submittal of a detailed, test

protocol that clearly identifies proposed operating conditions during the test.

For Condition VII.A.2.b(1), the applicant has requested clarification of the distinction between and applicability of regulations to hazardous air pollutants and toxic air pollutants. This is a standard condition in EPA's Part 71 permits and reflects almost verbatim, the language in 40 CFR 71.6(3)(iii)(B)(1). Hazardous air pollutants are those listed as hazardous air pollutants under Section 112 of the Clean Air Act. A parenthetical in the regulation, which is included in the permit, clarifies that the term "toxic air pollutant" refers to pollutants that are identified as toxic air pollutants in the underlying applicable regulation.

#### 5.9 Revise Conditions Regarding Boiler Operation

The applicant has requested that Condition III.A.1.d (requiring operation of the multiclones and wet scrubbers during boiler operation), Condition III.A.3.b (requiring monitoring and recordkeeping of the boiler exhaust stack oxygen concentration during boiler operation), Condition III.A.3.c (requiring continuous monitoring of the boiler exhaust stack temperature) and Condition III.A.3.d (requiring monitoring of the pressure drop across the wet scrubbers during boiler operation) all be revised to require the monitoring and recordkeeping activity only when the dryers are venting to the boilers. Additionally, CIPV proposes to reduce the frequency of recordkeeping required in Condition III.A.3.d to once every other hour.

These conditions should only apply while the veneer dryers are vented to the boilers. However, it should be noted that with the operational flexibility inherent in this permit (for example, the dryers are capable of venting to either of the boilers, or to both boilers) additional monitoring and recordkeeping would be required to document which boiler was receiving veneer dryer exhaust at any given time. When apprised of the additional monitoring and recordkeeping requirements, Geomatrix Consultants (on behalf of CIPV), in a December 6, 2004 e-mail, retracted the request to revise these four conditions. However, the applicant was still interested in relaxing the recordkeeping in Condition III.A.3.d to once every other hour.

Relaxation of Condition III.A.3.d monitoring of the wet scrubber pressure drop will provide data that is not consistent with the time period (one-hour test runs) used to establish the limits. Therefore, this portion of the condition has not been revised.

#### 5.10 Remove Throughput Limit

The applicant has requested removal of Condition III.A.1.f which limits the daily production rate of each veneer dryer based on the results of the most recent source test. The applicant believes that testing conducted to date, future testing and the ongoing parametric monitoring of boiler operations are adequate to demonstrate compliance with the emission limits. After consideration of the applicant's request, EPA continues to believe that some limit on production is an important part of ensuring that the dryer emissions remain below the limits established in Condition III.A.1.a of the permit. EPA has also determined, however, that the production limit can be revised to reflect the maximum individual capacity of each dryer as presented in the applicant's original Title V permit application. This revised limit, along with the revised source testing requirements discussed below and the other monitoring required by the permit, should provide the applicant with considerable more flexibility in operations and still provide a

reasonable assurance of compliance with the emission limits.

As discussed in the Section 5.1.5 of the Statement of Basis for the applicant's initial Title V permit, the applicant's Title V permit contains emission limits on the dryers that were installed in 2003 in order to avoid PSD permitting requirements that would otherwise apply to the dryers. In requesting and establishing these emission limits, both the applicant's emission inventory and EPA's PSD applicability analysis relied on veneer dryer emission factors from AP-42, and on an assumed control efficiency of 92.5%. These AP-42 emission factors are rated "D," a much lower rating than the best rating, "A." Because even the highest rated AP-42 emission factors are typically an average of measured data, and are not intended to represent the maximum potential to emit a pollutant from a source category, and because of the low rating of the emission factors used to establish the emission limits in this case, EPA included in the permit a compliance assurance regime that was based on source testing conducted at as high a production rate as possible. With compliance demonstrated at the maximum operating rate, EPA determined that ongoing monitoring and recordkeeping of parameters linked to operations during the source test would be adequate to reasonably assure ongoing compliance with the emission limits.

In establishing the production limit in the permit, EPA assumed that CIPV would have reached maximum operating capacity by the time it was required to conduct its initial performance tests (180 days after commencing operation of the new veneer dryers) so that the initial source tests could be conducted at maximum operating capacity. In practice, however, CIPV has been able to ramp up production of the veneer dryers at a much slower rate than originally expected.

According to discussions on February 9, 2005 with CIPV's consultant, the slow ramp up in production is attributable to several factors unique to the facility. At CIPV, the green veneer is unloaded and stacked by hand and transferred to the dryer area by forklift. At the dryers, the green veneer is loaded by a team of three workers per dryer. Because of the manual nature of the green veneer handling process at CIPV, it is highly dependent on staff experience and training and adversely impacted by employee turnover. Production has increased slowly over time as the staff has gained experience with equipment operation and as employee turnover has stabilized. The drying of "fishtails" (i.e., strips or pieces of veneer), part of normal operations at CIPV, also limits throughput due in part to the increased handling of the "fishtail" veneer. In short, the manual handling of the veneer appears to be the bottleneck in production, which is not expected to increase dramatically over time unless green veneer handling at CIPV is automated. CIPV has no plans, at this point, to automate its green veneer handling. Because the addition of an automated veneer handling system at CIPV could result in increased utilization of the dryers, such a change might well require review and permitting under the PSD program or under other regulatory requirements in place at the time of such change.

When Boiler 2 was tested in March 2004, CIPV was operating at only 34% of maximum production capacity. During the source test of Boiler 1 in May 2004, facility production of veneer was only 50% of maximum production capacity. As a result, the emission rates at maximum capacity have not yet been characterized, and so, the testing regime has been revised in this permit to provide for additional testing of both boilers. Testing is required in mid-2005, mid-2006 and in late 2007. EPA believes this testing frequency is adequate to quantify and confirm emission rates as production rates rise. Whenever tested, the dryers are to be operated at

the maximum operating rate of the dryers - this may be at a rate lower than the maximum capacity but should not be lower than achieved in practice.

The source tests conducted in 2004 indicate that introduction of the veneer dryer exhaust into the boilers resulted in a decrease in aggregate PM and PM10 emissions. This is probably due to the organic material in the veneer dryer exhaust enhancing complete combustion in the boilers' combustion zones. However, the additional tests, scheduled for the remainder of the permit term, will confirm how well this emission reduction is sustained at higher production rates.

The source test results also indicate that emissions of VOC rise as a result of introduction of the veneer dryer exhaust into the boilers. The emission rates measured thus far are well below the PSD significance thresholds. Even if the emission rates do rise considerably, the facility will be able to remain below the PSD significance thresholds by controlling annual production. Furthermore, the additional tests, scheduled for the remainder of the permit term, will yield new emission factors at the higher production rates.

In light of the available source test and production data indicating that CIPV has operated well in compliance with the emission limits, the fact that an increase in production is not likely to result in an increase in PM or PM-10 emissions, the fact that available information indicates that CIPV's manual handling of green veneer will not allow production to increase dramatically in a short period of time, and the fact that it will likely require a physical change at the facility to realize full dryer production rates, EPA believes that the limit on production throughput can be revised to provide CIPV more operating flexibility provided the source testing regime is enhanced to some extent, and emission estimation is conducted using the highest emission factor. As noted earlier, EPA is proposing to require that source tests be conducted on both veneer dryers and both boilers not later than June 30, 2005, and then again approximately one year later in 2006. The permit would continue to require source tests on both boilers and both dryers in the year before the permit expires and is due for renewal on June 10, 2008. EPA believes that requiring source tests in the next two years to generate additional facility-specific emission factors and to confirm the expected correlation between the production rate and emissions should, in conjunction with the other monitoring required in the permit, provide a reasonable assurance of compliance with the emission limits in Condition III.A.1.a of the permit.

Although EPA is revising the permit so that production is no longer limited to the dryer production rate measured during the most recent source test, EPA continues to believe that some limit on production is needed as part of the compliance assurance regime. In its original Title V permit application, CIPV stated that the capacity of each dryer was limited to each dryer's design rating - 16,320 square feet per hour, on a 3/8" basis. Because the PSD-avoidance limits in Condition III.A.1.a are based, in part, on this representation, EPA is including each dryer's design rating as a limit on the production capacity of the dryers.

## **6 Other Considerations in This Permit Modification**

### **6.1 Removal and Correction of Redundant and Obsolete Permit Conditions**

Upon review, it was noted that Condition III.A.1.k required the permittee to submit a permit application within 10 days after a source test. This condition was changed to require application

submittal within 45 days rather than 10 days, to allow the application to be submitted with the emission test results.

Further review also indicated that certain conditions in the permit served little purpose, and were redundant in that they would only apply if the facility needed to alter or modify this permit. Specifically, Conditions XII.B, C, D and E list the requirements should a permit amendment or modification be required. Rather than repeat the rule requirements in the permit, the conditions were abbreviated to refer to the appropriate rule citation.

In addition, Condition XII.I.1.a was updated to refer to page one of the permit to ascertain the permit expiration date.

## **6.2 Changes to Permitted Emissions**

The changes requested by the applicant in this significant permit modification application address monitoring and recordkeeping functions, as well as the dryer production limit. The requested changes do not affect the facility's actual emissions or potential to emit either criteria or hazardous air pollutants. CIPV's PTE remains unchanged as a result of this permit action, and is presented below in Table 6.1.

**Table 6.1**  
**Facility Potential to Emit for PSD , Title V, and MACT in Tons Per Year**

EU ID #	<b>Air Pollutants</b> NOx - oxides of nitrogen; VOC - volatile organic compounds; SO2 - sulfur dioxide; PM - particulate matter; PM10 - particulate matter with diameter 10 microns or less; CO - carbon monoxide; Pb - lead; HAP - hazardous air pollutants [see Clean Air Act, Section 112(b)]							
	NOx	VOC	SO2	PM	PM10	CO	Pb	HAP
RSB-1	145	11	16	38	55	393	<1	25
RSB-2	145	11	16	38	55	393	<1	25
CC-1				44	22			
CC-2				66	33			
CC-3				44	22			
CC-4				44	22			
CC-5				44	22			
CC-6				44	22			
CC-7				44	22			
DP	2	<1	<1	<1	<1	<1	<1	<1
PP-1		35		17	26			21
PP-2		11		5	8			6
VT		13						2
LV		2						2
VD-1		10		2	7	<1		<1
VD-2		10		2	7	<1		<1
DK		2		<1	<1			
<b>TOTAL</b>	<b>291</b>	<b>105</b>	<b>33</b>	<b>429</b>	<b>322</b>	<b>787</b>	<b>&lt;1</b>	<b>83</b>

### 6.3 Fee Payments

CIPV is required to pay fees annually based on an emissions inventory of its actual emissions for the preceding calendar year (See permit terms IX and X). EPA has documented methods, techniques, and assumptions that EPA believes provide the most accurate basis for estimating emissions from the facility, including actual emissions for fee purposes - see original (June 10, 2003 Statement of Basis). These techniques in Section 4.2 of the original Statement of Basis should be used to calculate annual emissions for fee purposes, unless CIPV has other information showing why another technique more accurately represents its emissions.

CIPV's fees since issuance of the original Title V permit, i.e. for 2003 and for 2004, have been

paid for both years.

#### 6.4 Compliance Assurance Monitoring Rule (CAM) - 40 CFR Part 64

CAM applies to emission units subject to an emission limit and with a pre-control potential to emit greater than the major source threshold defined in Part 71. However, only units with post control potential to emit greater than the major source thresholds must comply with CAM at initial permit issuance or during a significant permit modification. All other units that meet the CAM applicability criteria must be in compliance at permit renewal. Only the dryer emissions are limited and controlled; but the post-control emissions are not greater than the major source threshold. The dryers will be subject to CAM at permit renewal. None of the other emission units with post control potential to emit pollutants greater than the major source threshold are subject to an emission limit and they are therefore not subject to CAM at this time.

#### 6.5 NESHAPs - 40 CFR Part 63

The National Emission Standards for Hazardous Air Pollutants contained in 40 CFR Part 63 generally apply to HAP major sources. In essence, HAP major sources are facilities with a potential to emit a single HAP of at least 10 tpy or two or more HAPs at least 25 tpy. In the original Title V permit review, it was determined that the PTE of this facility to emit HAPs is in excess of the 25 tpy threshold. As part of this review, the following potentially applicable NESHAPs have been identified. However, it should be noted that the facility bears the obligation to identify and comply with all applicable NESHAPs as they are promulgated.

Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (HAP) from Industrial, Commercial and Institutional Boilers and Process Heaters: This standard was published on September 13, 2004. The effective date for an existing boiler, as at CIPV, is September 13, 2007, although notice requirements may apply before then. Pursuant to 40 CFR 71.7(f), EPA intends to reopen this permit to incorporate the requirements of this subpart.

Subpart DDDD - National Emission Standards for Hazardous Air Pollutants (HAP) from Plywood and Composite Wood Products: This standard was published on July 30, 2004, and applies to the collection of dryers, refiners, blenders, formers, presses, board coolers and other units associated with the manufacturing of plywood and composite wood products. Based on the facility PTE for HAP emissions, the CIPV veneer and plywood operations will be subject to this rule. The compliance date for an existing source, as at CIPV, is October 1, 2007, although notice requirements do apply before then. Pursuant to 40 CFR 71.7(f), EPA intends to reopen this permit to incorporate the requirements of this subpart.

Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (HAP) from Reciprocating Internal Combustion Engines: This standard was finalized on June 15, 2004. The rule applies to engines that are rated more than 500 brake horsepower. From the Title V application materials, the applicant has indicated that the facility only contains one internal combustion engine. The engine is used to power a fire-water pump, and is rated at 240 horsepower. Consequently, this rule does not apply to sources at CIPV.

#### 6.6 Endangered Species Act (ESA) Impacts

Under Section 7 of the ESA, 16 U.S.C. § 1531 et seq., EPA is obligated to consider the impact that a project may have on listed species or critical habitats. As this significant permit modification application will result in no new construction and no new emissions, issuance of this Title V permit for CIPV, will not affect a listed species or critical habitat. Therefore, no additional requirements will be added to this permit for ESA reasons.

## **7 Proposed Changes to Title V Permit**

7.1 The following permit conditions have been added:

None.

7.2 The following permit conditions have been removed:

Condition III.A.1.a(1)

Condition III.A.4.a

7.3 The following permit conditions have been revised:

III.A.1.a

III.A.1.f, h, i, j and k

III.A.2.a(1)

III.A.2.b, c and e

III.A.3.g

XII.B, C, D, E and I.

## **8. Public Participation**

8.1 Public Notice.

Pursuant to 40 CFR 71.7(e)(3)(ii), significant modifications must meet all requirements that apply to initial permit issuance, including those for public participation. And as described in 40 CFR 71.11(a)(5), all Part 71 draft operating permits shall be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71.11(d). There is a 30 day public comment period for actions pertaining to a draft permit.

Public notice was given for this draft permit by mailing a copy of the notice to the permit applicant, the affected state, the Tribal, city and county executives, and the local emergency planning authorities which have jurisdiction over the area where the source is located. A copy of the notice has also been provided to all persons who submitted a written request to be included on the mailing list. Public notice was also published in a daily or weekly newspaper of general circulation in the area affected by this source.

8.2 Opportunity for Comment

As described in section 8.1 above, opportunity for comment was provided from April 20, 2005 to May 20, 2005. A copy of the draft permit prepared by EPA, this statement of basis, the

application, and all supporting materials submitted by the source were made available for public review at:

**Colville Indian Library**  
**Nespelem, WA 99155**  
**(509) 634-4711 x2791**

**Omak Public Library**  
**30 South Ash Street**  
**Omak, WA 98841-0969**  
**(509) 826-1820**

Copies of the permit and statement of basis were also made available at no cost on EPA's web site [[www.epa.gov/r10earth/](http://www.epa.gov/r10earth/)]. All documents were also made available for review at the EPA Region 10 Office indicated below during regular business hours.

**U.S. EPA, Region 10 (AWT-107)**  
**1200 6<sup>th</sup> Avenue**  
**Seattle, WA 98101**

No comments were received during the 30-day opportunity for comment. As a result, no substantive changes were made to the draft permit in preparing for issuance of the final permit.

### **8.3 Mailing List**

If you would like to be added to our mailing list to be informed of future actions on this or other Clean Air Act permits issued in Indian Country, please send your name and address to EPA at the address listed in section 8.2 above.

Appendix A - Original Statement of Basis, Issued June 10, 2003

**Air Pollution Control**  
**Title V Permit to Operate**

**Statement of Basis for Final Permit No. R10T5-WA-03-01**  
June 10, 2003

**Colville Tribal Enterprise Corporation  
dba Colville Indian Power & Veneer  
Colville Reservation  
Omak, Washington**

**1 EPA Authority to Issue Part 71 Permits**

On July 1, 1996 (61 FR 34202), EPA adopted regulations codified at 40 CFR Part 71 setting forth the procedures and terms under which the Agency would administer a federal operating permit program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate EPA's approach for issuing federal operating permits to covered stationary sources in Indian Country.

As described in 40 CFR 71.4(a), EPA will implement a Part 71 program in areas where a state, local, or Tribal agency has not developed an approved Part 70 program. Unlike states, Indian Tribes are not required to develop operating permit programs, though EPA encourages Tribes to do so. See, for example, Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian Country, EPA will administer and enforce a Part 71 federal operating permits program for stationary sources until Indian Tribes receive approval to administer their own operating permit programs.

**2 The Confederated Tribes of the Reservation of Washington**

- 2.1 Indian Country: The Confederated Tribes of the Colville Reservation (Colville Tribes) is a federally recognized Indian Tribe. The Colville Reservation is considered to be Indian Country, as defined in 40 CFR Part 71.
- 2.2 The Colville Reservation: On April 9, 1872, President Grant set apart lands in the Columbia Rivers Basin as a 2,100 square mile reservation for the Colville and neighboring Indian tribes not parties to any treaty. In July of the same year the area was redefined as lands between the Columbia and Okanogan Rivers bounded in the North by the Canadian border. A treaty on July 1, 1892 ceded the north half of the reservation to the United States, reducing the reservation to its current size of 1.4 million acres while retaining hunting and fishing rights for the area defined in July of 1872. Today there are 7 locations of community activities located within the boundaries of the reservation. Based on the 2000 U S Census data, the population is 7,587 on the reservation and trust lands. Tribal enrollment is 8,700.
- 2.3 Tribal Government: The Colville Tribes operate under a constitution approved on February 26, 1938. This constitution provides that a 14 member Colville Business

Council is the governing body.

- 2.4 Local Air Quality and Attainment Status: North-Central Washington, including the Colville Reservation, is "unclassifiable" regarding attainment of the national ambient air quality standard for all criteria pollutants. An area is unclassifiable when there is insufficient monitoring data to determine attainment status.

### **3 Facility Information**

#### **3.1 Location**

The Colville Indian Power & Veneer (CIPV) facility is located within the boundaries of the Colville Reservation in North-Central Washington. The Colville Reservation is considered Indian Country, as defined by 40 CFR Part 71. The facility is located at 1100 Eighth Avenue East in Omak, Washington.

#### **3.2 General Description of Operations and Products**

CIPV is an operating division of the Colville Tribal Enterprise Corporation, a business enterprise of the Colville Tribes. The facility manufactures green and dry veneer and softwood plywood, produces electricity and dries lumber that is brought to the plant. Byproducts include wood chips and lathed log cores. The raw materials for the plant includes logs, hogged fuel and sawdust. The maximum annual plywood production is 360,000 thousand square feet (msf) of 3/8 inch plywood; however, actual production is expected to be closer to 220,000 msf. The facility's two steam driven turbines combined are capable of producing 12.5 megawatts of electricity. The facility is capable of drying approximately 6 million bf/yr of lumber in 2 dry kilns.

Logs (40% Ponderosa Pine and 60% Larch and Douglas Fir) are brought to the site by truck or train and are scaled, sorted and stored in the log yard. Some logs are sent to other facilities after sorting. The logs enter the process via the log deck, after which they are debarked by two debarkers and cut to length. Scrap ends, or lily pads, are sent to a grinder via conveyor and then conveyed via belt conveyor along with the bark to the hogged-fuel pile to be burned as fuel in two boilers. A number of logs, called blocks, are placed in the log steaming vats to be heated and softened by hot water before being sent to the lathe for peeling into thin sheets of green veneer.

The lathe cores (log centers that cannot be peeled) are sent to storage and sold as a byproduct. The veneer is trimmed and the waste is conveyed with any lathe waste to a chipper and on to the chip storage bin. Material in the chip storage bin is pneumatically conveyed to railcars for shipping as a byproduct. Green veneer is dried in two steam heated dryers and then either shipped as product or glued into layers by the curtain coater which uses phenol-formaldehyde resin. The glued panels are pressed together in two steam heated presses to make rough plywood which is shipped as product. The plywood panels may optionally be cut to size and sanded prior to shipping.

Trucks deliver hogged fuel and sawdust to the plant which is added to the hogged fuel produced on site. The hogged fuel-sawdust mixture is fed to two hogged-fuel fired, Riley-Stoker brand boilers which produce steam to heat the steaming vats, lumber kilns, veneer dryers and presses and to produce electricity in two turbines. The boilers, rated at 150 mmBTU/hr heat input each (130,000 lb/hr steam produced each), do not have any back-up fuel (e.g. gas or oil) capability. Each boiler has a multiclone and wet scrubber for particulate emission control and vent through individual stacks. The plant has one 240 hp diesel-fueled water pump for fighting fires which is only used when needed or being test-run. Other sources of fugitive air emissions include paved and unpaved road traffic, log yard activities, material storage piles and miscellaneous material handling, welding, painting and cleaning activities. There are seven cyclones used for pneumatically handling chips and hogged fuel throughout the plant.

Until the year 2000, the plant also produced green and dry lumber. The plant used steam-heated kilns to dry the green lumber and three direct-fired (sawdust fueled) dryers to dry veneer. The sawmill, kilns (all but two), direct-heated dryers (one still exists but is not operated), a third debarker, plywood finishing saws and sanders and related equipment have been permanently shut down and are not addressed in this permit. The two indirectly-heated veneer dryers were installed in early 2003.

### 3.3 Emission Units and Emission Generating Activities

Table 3-1 lists and describes the emission units and control devices (or techniques) at the facility. Those control devices that are required by rule or this permit are so noted. Part 71.5 (c)(11)(ii)(A) and (B) allow sources to separately list in the permit application such units or activities that qualify as "insignificant" (referred to as insignificant emission units) based on potential emissions below two tons/year for all regulated pollutants that are not listed as hazardous air pollutants ("HAP") under Section 112(b) and below 1000 lbs/year or the de minimus level established under Section 112(g), whichever is lower, for HAPs. However, the application may not omit information needed to determine the applicability of, or to impose, any applicable requirement, or to calculate the permit fee. Units that qualify as insignificant emission units (IEUs) for the purpose of the Part 71 permit application are in no way exempt from applicable requirements or any requirements of the Part 71 permit. Table 3-2 lists the units identified by CIPV in their permit application as qualifying as IEUs for permit application purposes. CIPV later identified the lay-up line as an IEU based on the fact that the resin, containing VOC and HAP compounds, is exposed for only a very short time before entering the presses, where most of the volatile emissions and HAP are emitted and accounted for.

**Table 3-1 Emission Units (EU) & Control Devices**

EU ID #	Emission Unit Description	Control Device*
RSB-1	Wood waste fired boiler #1; Stoker-Riley brand; installed 10/1/74; 150,000 mmBtu/hr input & 130,000 pph steam output capacity; powers turbine #1	Boiler multiclone & wet scrubber #1; installed 10/1/74; Bumsted-Wolferd brand (required)
RSB-2	Wood waste fired boiler #1; Stoker-Riley brand; installed 6/1/75; 150,000 mmBtu/hr input & 130,000 pph steam output capacity; powers turbine #2	Boiler multiclone & wet scrubber #2; installed 6/1/75; Bumsted-Wolferd brand (required)
CC-1	Cyclone #1 on pneumatic material handling system: chip bin to fuel pile - wood chips & hogged fuel	none
CC-2	Cyclone #2 on pneumatic material handling system: fuel pile to powerhouse - hogged fuel	none
CC-3	Cyclone #3 on pneumatic material handling system: plywood plant to fuel pile - hogged fuel	none
CC-4	Cyclone #4 on pneumatic material handling system: stud mill to powerhouse - hogged fuel	none
CC-5	Cyclone #5 on pneumatic material handling system: fuel pile to powerhouse - hogged fuel	none
CC-6	Cyclone #6 on pneumatic material handling system: chipper to truck bin - wood chips	none
CC-7	Cyclone #7 on pneumatic material handling system: plant to truck bin - sawdust	none
DP	Diesel-fueled fire-water pump; 240 hp	none
MH	Material handling activities (fugitives): hogged fuel conveyor; hogged fuel delivery; sawdust delivery; railcar loading (chips); boiler ash	none
DB	Log debarkers #1 and 2 (fugitives); Salem & Soderham brands; installed in 1971 and 1975	none
PP-1	Plywood presses #1; phenol formaldehyde resin; steam-heated; installed in 1971	none
PP-2	Plywood presses #2; phenol formaldehyde resin; steam heated; installed in 1971	none
VT	Veneer trimmer & trim chipper	none
LV	Log steaming vats #1 through 11, steam heated	none

EU ID #	Emission Unit Description	Control Device*
VD-1	Veneer dryer #1; indirect steam heat from boilers; 16,320 (3/8") sf/hr capacity; installed in 2003	Boilers #1 and #2 & multiclones & wet scrubbers #1 & #2 (required)
VD-2	Veneer dryer #2; indirect steam heat from boilers; 16,320 (3/8") sf/hr capacity; installed in 2003	Boilers #1 and #2 & multiclones & wet scrubbers #1 & #2 (required)
DK	Lumber drying kilns #1 and 2; steam heated; 3 million board-feet per year capacity each	none
MP	Material storage piles (fugitives); hogged fuel and sawdust pile	none
LY	Log yard wind blown dust (fugitives)	watering
PR	Paved plant roads (fugitives)	watering
UR	Unpaved plant roads (fugitives); includes log yard traffic	watering

\* Control devices column includes all techniques used to control air pollution - required techniques or devices are noted.

**Table 3-2 Insignificant Emission Units (IEU)**

EU ID #	Emission Unit Description
IEU-1	100 Gallons safety-Kleen 105 solvent SK Part # 6614 (used in truck shop)
IEU-2	10 Comfort air conditioners
IEU-3	115 Gallons paints, spray paint & regular latex paint
IEU-4	4.5 tons/yr welding rods
IEU-5	Plywood lay-up line prior to pressing using phenol-formaldehyde resin via curtain coater

### 3.4 Permitting and/or Construction History

This facility was originally built in the mid-1970s. Prior to 1996, Omak Wood Products owned the facility. In 1996, they added a third dryer to the facility. At that time, the dryers were all direct-fired using sawdust burners. EPA determined in 1997 that the addition of the third dryer constituted a major modification to a major facility which requires a Prevention of Significant Deterioration (PSD) permit. Omak had not obtained a PSD permit prior to construction, which was a violation of the Clean Air Act. The violation resulted in a Consent Order which required Omak to install Best Available Control Technology (BACT) for the three dryers. Omak filed for bankruptcy in March, 1997 and sold the facility to Quality Veneer and Lumber (QVL) doing business as Washington Veneer in July, 1998. QVL chose to vent the dryer emissions to the boilers' combustion chambers to meet the BACT requirement in the Consent Order. The new

control system was installed and tested by late summer, 1999. As required, QVL submitted a Title V operating permit application to EPA in August, 1999. Supplemental operating permit application information was submitted by QVL in January, 2000.

In July, 2000, QVL closed the facility, filing for bankruptcy in October, 2000. CTEC, doing business as CIPV, purchased the facility in December, 2001, and began to operate the power generation equipment in April, 2002. On August 26, 2002, CTEC requested guidance from EPA regarding the installation of two new indirectly-heated dryers that would replace the three direct-fired dryers. On November 25, 2002, CTEC requested emission limits which would allow the new dryers to avoid the PSD program and submitted an updated Title V operating permit application. Additional information was submitted between January and April, 2003. The owner-requested limits necessary to avoid PSD will be established in this operating permit and will allow CIPV to begin construction of the new dryers on the effective date of this permit.

CIPV plans to restart the veneer drying and plywood processes after issuance of this permit. CIPV has stated that they do not intend to operate certain parts of the facility (see Section 3.2 for more information). Restarting the shutdown emissions units and equipment would be subject to a PSD if such restart increased the emissions by the significant thresholds. CIPV can request an applicability determination by EPA before restarting any shutdown equipment.

There are no historical records in EPA's files regarding plant modifications prior to the modification in 1996. A source seeking a determination of non-applicability of PSD permitting requirements would need to provide EPA with detailed information regarding each change at the facility. For this reason, no enforcement or permit shield is implied or granted for past PSD compliance.

## **4 Emission Inventories and Fee Payment**

### **4.1 Emission Inventory Basics**

Emission inventories serve several important functions in connection with issuance of Title V permits, including determining the applicability of regulatory requirements and calculating fees. This section explains the role of emission inventories in issuing Title V permits and how emission inventories are developed.

An emission inventory is an accounting of the air pollution emitted by a source, and can be presented as either the "actual" or "potential" emissions from the source. Actual emissions are generally based on actual operation and controls and represent a specific period of time. Potential emissions, referred to as potential to emit (PTE), generally represent the maximum capacity of a source to emit a pollutant under its physical and operational design, taking into consideration regulatory restrictions and required control devices. Regulatory programs often dictate which type of inventory is used for applicability and fee purposes, specifying which time periods, pollutants and operations must be considered.

Emissions caused by industrial facilities can be broken into two categories: point and fugitive. Fugitive emissions are those which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening. Point sources of emissions include any emissions that are not fugitive. Examples of fugitive emissions are roads, piles that are not normally enclosed, wind blown dust from open areas, and those operations that are normally performed outside buildings.

Title V requires all major sources of air pollution, and some minor sources, to get operating permits. Whether a source is major for Title V is based on the PTE of the source. Only point source emissions (not fugitive) are included in the PTE under the Title V program unless the source belongs to a particular category of sources and except in the case of hazardous air pollutants (HAPs) (see "major source" in 40CFR70.2). See Section 4.3 for a discussion of CIPV's PTE. Title V requires sources to submit fees with their initial Title V application and annually thereafter. The amount of the fee is based on actual emissions and includes consideration of point and fugitive emissions. See Section 4.4 for a discussion of fee payments.

EPA's Prevention of Significant Deterioration (PSD) program is a pre-construction permitting program. PTE is also used to determine the applicability of the PSD program and fugitive emissions are included in determining the PTE of a source only for certain types of sources (same categories as Title V). See Sections 3.4 and 5.1.4 for additional discussion of the PSD program as it relates to CIPV.

Under Section 112 of the Act, EPA has promulgated Maximum Achievable Control Technology (MACT) regulations that establish a number of requirements for certain types of industrial sources that emit HAPs. PTE is also used to determine the applicability of MACT standards to a facility, but under Section 112, PTE includes only HAPs and counts all fugitive emissions. For more information on the MACT standards which may apply to CIPV, see section 5.1. The applicability of other requirements to a facility may also depend on the facility's actual emissions or PTE.

Emission estimates in emission inventories rely on information gained about the emission unit in question, or about other similar emission units, through emission testing or monitoring. There are various ways to gather the information needed to develop emission factors. The more similar the tested or monitored source is to the one in question (actual tests or monitoring on the source itself is obviously the best information one can obtain), the more accurate the information is for estimating emissions. In order of preference, starting with the best, the following types of information is used to develop "emission factors" which predict the amount of pollution that may be caused by a given amount of operation (e.g. production, firing rate, operating time) and are often presented in terms of mass of emission per unit production, operation or time (e.g. lb per mbl steam produced, lb per msf of panel produced, lb per ton of material handled, and etc): continuous emission monitoring data; emission tests; mass balances; factors developed for similar sources; general emission factors; and engineering judgement. Emission factors have been published by EPA, and a number of other organizations, and are generally meant to be industry averages. Site-specific testing and development of emission factors is

particularly important when emission control devices are utilized. Future testing at CIPV will provide information to develop site-specific emissions factors which will replace some "average" values currently used the emission inventory.

In any event, emission factors can only estimate emissions. For applicability and compliance purposes, it is the responsibility of the source to accurately characterize and estimate their emissions and appropriately select and use emission factors. Inaccurate characterization or estimation of the source's emissions could result in an enforcement action.

Air pollutants must be carefully defined in emission inventories, because the testing that is used as a basis for a particular emission factor may not have distinguished various forms of pollutants and chemicals. For instance, fine particulate matter, (PM<sub>10</sub> - particulate that is 10 microns or less in aerodynamic size), is not always a subset of particulate matter (PM - generally includes particulate in the 35 to 70 micron size range), because PM<sub>10</sub> and PM are measured using different techniques. The measurement (test method) of PM<sub>10</sub> includes condensible particulate matter (those particulates which are often gaseous in stacks but condense and react to become particulate matter which is measured in ambient air monitors some distance away from the stack and source), while the measurement of PM does not. In some cases, PM<sub>10</sub> is a fraction of the PM, while in other cases, the PM<sub>10</sub> emissions may be greater than the PM emissions. While the measurement techniques for lead can vary as well, the accounting of lead is complicated by the fact that it is both a "criteria pollutant" and a HAP. Some, but not all, VOC are also HAP, but not all volatile HAP are counted as VOC, due to their limited reactivity in the atmosphere. Likewise, many HAP are in the form of particulate and counted as such in a PM or PM<sub>10</sub> measurement. Therefore, while it is important to estimate all of the pollutants as accurately as possible, individual emission estimates, particularly for PM, PM<sub>10</sub>, HAP, lead and VOC, should be understood and carefully reviewed to avoid double counting the emissions for fee purposes. For fee payment, EPA does not require PM to be summed, thus avoiding some of the potential double counting.

#### 4.2 Emission Inventory Techniques for CIPV

Emission inventories of actual and PTE emissions were submitted with the original Title V permit application for this facility (the first one was submitted by QVL prior to the change of ownership). The permittee also supplemented and revised the emission inventory in several subsequent submittals to reflect planned operations and to respond to EPA's initial feedback. An actual emission inventory was also submitted to support CIPV's annual fee payment in November, 2002. EPA reviewed CIPV's source lists and emission inventory in connection with drafting the permit. In some instances, EPA revised the emission estimates provided by CIPV in their application and subsequent submittals to more accurately reflect the emissions from the facility. This section describes emission estimating techniques for the CIPV facility relied on by EPA in preparing the draft permit.

It is EPA's expectation that CIPV will use the emission estimating techniques set forth in

this section unless CIPV has other information showing why another technique more accurately represents its emissions. It is important to emphasize that to the extent CIPV relies on any type of emission control technique (e.g. road watering or sweeping, pile enclosures, etc) to estimate emissions used to determine annual fees or the applicability of a regulatory program, use of the technique must be fully documented and verifiable. Note that the veneer dryer and some boiler emission factors will be revised after emission testing is performed as required in this permit.

Equation 4-1 represents the basic technique for estimating emissions (in tons per year) from all emission units at the facility. The equation relies on an emission factor and an operational parameter that is multiplied by the emission factor. The emission factors to use in the equations are presented for each pollutant emitted and each emission unit in Table 4-1. HAP emission factors are presented as a sum of all HAPs emitted (or known to be emitted) from each emissions unit. Individual HAP emission factors are listed in Table 4-2. The appropriate operational parameter, that pairs with the emission factors in Table 4-1 for each pollutant and emission unit is presented in Table 4-3. Note that the techniques presented are generally appropriate for estimating actual as well as potential emissions; however, actual emissions must reflect actual operational data while potential emissions must reflect the maximum operations or capacity of the emission unit.<sup>1</sup>

$$E = EF \times OP \times K \quad (\text{Eq. 4-1})$$

Where:

E = pollutant emissions in tons/year

EF = emission factor (Table 4-1 and Table 4-2)

OP = recorded actual annual operational parameter (Table 4-3)

K = 1 ton/2000 lbs for conversion from pounds per year to tons per year

The emission factors for material handling (MH), roads (PR and UR) and material piles (MP) must be calculated using site-specific information. See the reference documents for those estimation techniques (cited in Table 4-1) for a more complete description. For those estimation techniques that require substantial site-specific parameter tracking, such as piles and roads, emissions associated with a defined operational rate (amount of logs processed or plywood produced in a year) can be estimated to establish a set ratio that can be used to multiply by the actual operational rate in future years, significantly simplifying the annual inventory effort. All of the techniques and site-specific parameters and assumptions should be reviewed each year before estimating emissions to be sure they remain appropriate.

**Table 4-1      Emission Factors (EF) for Use in Emission Inventories**

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<sup>1</sup>As discussed above, actual emissions form the basis for calculating fees initially and annually while potential emissions are generally used to determine the applicability of air pollution control requirements and programs.

EU ID #	Pollutant	EF	Units	Reference (Source of Emission Factor)
RSB-1	NOx	0.2538	lb/mlb steam	AP-42 (3/02) Table 1.6-2; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	VOC	0.0201	lb/mlb steam	AP-42 (3/02) Table 1.6-3; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	SO2	0.0288	lb/mlb steam	AP-42 (3/02) Table 1.6-2; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	PM	0.066	lb/mlb steam	AP-42 (3/02) Table 1.6-1; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	PM10	0.0958	lb/mlb steam	AP-42 (3/02) Table 1.6-1; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	CO	0.69	lb/mlb steam	AP-42 (3/02) Table 1.6-2; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	Pb	5.54E-5	lb/mlb steam	AP-42 (3/02) Table 1.6-4; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	HAP (total)	4.4E-2	lb/mlb steam	AP-42 (3/02) Tables 1.6-3 and 1.6-4; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr); sum of 35 HAPs emitted (Table 4-2)
RSB-2	NOx	0.2538	lb/mlb steam	AP-42 (3/02) Table 1.6-2; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	VOC	0.0201	lb/mlb steam	AP-42 (3/02) Table 1.6-3; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	SO2	0.0288	lb/mlb steam	AP-42 (3/02) Table 1.6-2; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	PM	0.066	lb/mlb steam	AP-42 (3/02) Table 1.6-1; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	PM10	0.0958	lb/mlb steam	AP-42 (3/02) Table 1.6-1; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)

EU ID #	Pollutant	EF	Units	Reference (Source of Emission Factor)
	CO	0.69	lb/mlb steam	AP-42 (3/02) Table 1.6-2; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	Pb	5.54E-5	lb/mlb steam	AP-42 (3/02) Table 1.6-4; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr)
	HAP (total)	4.4E-2	lb/mlb steam	AP-42 (3/02) Tables 1.6-3 and 1.6-4; converted from mmbtu to mlb steam basis by multiplying by 1.1538 (ratio of 150 mmbtu/hr & 130 mlb steam/hr); sum of 35 HAPs emitted (Table 4-2)
CC-1	PM	0.50	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1
	PM10	0.250	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1; assumes PM10 = 50% PM for medium efficiency cyclone
CC-2	PM	0.50	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1
	PM10	0.250	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1; assumes PM10 = 50% PM for medium efficiency cyclone
CC-3	PM	0.50	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1
	PM10	0.250	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1; assumes PM10 = 50% PM for medium efficiency cyclone
CC-4	PM	0.50	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1
	PM10	0.250	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1; assumes PM10 = 50% PM for medium efficiency cyclone
CC-5	PM	0.50	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1
	PM10	0.250	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1; assumes PM10 = 50% PM for medium efficiency cyclone
CC-6	PM	0.50	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1

EU ID #	Pollutant	EF	Units	Reference (Source of Emission Factor)
	PM10	0.250	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1; assumes PM10 = 50% PM for medium efficiency cyclone
CC-7	PM	0.50	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1
	PM10	0.250	lb/dry ton	Oregon DEQ Permitting & Inspection Manual (11/15/93) page VII.E.1-1; assumes PM10 = 50% PM for medium efficiency cyclone
DP	NOx	7.44	lb/hr	AP42 (10/96) Table 3.3-1; converted from hp-hr to hr basis by multiplying 0.031 by 240 hp (size of engine)
	VOC	0.602	lb/hr	AP42 (10/96) Table 3.3-1; converted from hp-hr to hr basis by multiplying 0.00251 by 240 hp (size of engine)
	SO2	0.492	lb/hr	AP42 (10/96) Table 3.3-1; converted from hp-hr to hr basis by multiplying 0.00205 by 240 hp (size of engine)
	PM	0.528	lb/hr	AP42 (10/96) Table 3.3-1; converted from hp-hr to hr basis by multiplying by 240 hp (size of engine); all PM is assumed to be less than 1 micron
	PM10	0.528	lb/hr	AP42 (10/96) Table 3.3-1; converted from hp-hr to hr basis by multiplying by 240 hp (size of engine)
	CO	1.603	lb/hr	AP42 (10/96) Table 3.3-1; converted from hp-hr to hr basis by multiplying by 240 hp (size of engine)
	HAP (total)	1.07E-2	lb/hr	AP42 (10/96) Table 3.3-1; converted from hp-hr to hr basis by multiplying by 240 hp (size of engine); sum of 9 HAPs emitted (Table 4-2)
MH	PM	Calculated	lb/ton	AP42 (1/95) Section 13.2.4, Equation (1); apply to each process
	PM10	Calculated	lb/ton	AP42 (1/95) Section 13.2.4, Equation (1); apply to each process
DB	PM (fir)	0.0904	lb/mbf	FIRE 6.23 (AP42, 1985); converted from ton log to mbf log basis by multiplying by 4.108 (fir log density from Log Scaling & Timber Cruising, Oregon State University, 1986; assume PM10 = 50% PM

EU ID #	Pollutant	EF	Units	Reference (Source of Emission Factor)
	PM10 (fir)	0.0452	lb/mbf	FIRE 6.23 (AP42, 1985); converted from ton log to mbf log basis by multiplying by 4.108 (fir log density from Log Scaling & Timber Cruising, Oregon State University, 1986
	PM (pine)	0.1016	lb/mbf	FIRE 6.23 (AP42, 1985); converted from ton log to mbf log basis by multiplying by 4.614 (pine log density from Log Scaling & Timber Cruising, Oregon State University, 1986; assume PM10 = 50% PM
	PM10 (pine)	0.0508	lb/mbf	FIRE 6.23 (AP42, 1985); converted from ton log to mbf log basis by multiplying by 4.614 (pine log density from Log Scaling & Timber Cruising, Oregon State University, 1986
PP-1	PM	0.12	lb/msf (3/8")	AP42 (1/02) Table 10.5-4
	PM10	0.185	lb/msf (3/8")	AP42 (1/02) Table 10.5-4; sum of 85% filterable PM (ODEQ Permitting & Inspection Manual 11/15/93) plus condensible PM
	VOC	0.25	lb/msf (3/8")	AP42 (1/02) Table 10.5-6
	HAP (total)	0.149	lb/msf (3/8")	AP42 (1/02) Table 10.5-6; sum of 6 HAPs emitted (Table 4-2)
PP-2	PM	0.12	lb/msf (3/8")	AP42 (1/02) Table 10.5-4
	PM10	0.185	lb/msf (3/8")	AP42 (1/02) Table 10.5-4; sum of 85% filterable PM (ODEQ Permitting & Inspection Manual 11/15/93) plus condensible PM
	VOC	0.25	lb/msf (3/8")	AP42 (1/02) Table 10.5-6
	HAP (total)	0.149	lb/msf (3/8")	AP42 (1/02) Table 10.5-6; sum of 6 HAPs emitted (Table 4-2)
VT	VOC	0.072	lb/msf (3/8")	AP42 (1/02) Table 10.5-7
	HAP (total)	0.01175	lb/msf (3/8")	AP42 (1/02) Table 10.5-7; sum of 4 HAPs emitted
LV	VOC	0.012	lb/msf (3/8")	AP42 (1/02) Table 10.5-7; sum of 2 HAPs due to no VOC data
	HAP (total)	0.012	lb/msf (3/8")	AP42 (1/02) Table 10.5-7; sum of 2 HAPs emitted (Table 4-2)
VD-1	PM	0.0263	lb/msf (3/8")	AP42 (1/02) Table 10.5-1; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system

EU ID #	Pollutant	EF	Units	Reference (Source of Emission Factor)
	PM10	0.1013	lb/msf (3/8")	AP42 (1/02) Table 10.5-1; sum of 100% filterable PM (ODEQ Permitting & Inspection Manual 11/15/93) plus condensible PM; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
	CO	0.0053	lb/msf (3/8")	AP42 (1/02) Table 10.5-3; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
	VOC	0.1391	lb/msf (3/8")	AP42 (1/02) Table 10.5-3; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
	HAP (total)	0.0080	lb/msf (3/8")	AP42 (1/02) Table 10.5-3; sum of heating & cooling sections; sum of 11 HAPs emitted; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
VD-2	PM	0.0263	lb/msf (3/8")	AP42 (1/02) Table 10.5-1; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
	PM10	0.1013	lb/msf (3/8")	AP42 (1/02) Table 10.5-1; sum of 100% filterable PM (ODEQ Permitting & Inspection Manual 11/15/93) plus condensible PM; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
	CO	0.0053	lb/msf (3/8")	AP42 (1/02) Table 10.5-3; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
	VOC	0.1391	lb/msf (3/8")	AP42 (1/02) Table 10.5-3; sum of heating & cooling sections; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system
	HAP (total)	0.0080	lb/msf (3/8")	AP42 (1/02) Table 10.5-3; sum of heating & cooling sections; sum of 11 HAPs emitted; assume 92.5% reduction for boiler, multiclone, scrubber pollution control system

EU ID #	Pollutant	EF	Units	Reference (Source of Emission Factor)
DK	PM	0.02	Lb/mbf	Oregon DEQ Permit Application Guidance AQ-EF02 (4/25/00); based on OSU study for Douglas Fir
	PM10	0.02	Lb/mbf	Oregon DEQ Permit Application Guidance AQ-EF02 (4/25/00); based on OSU study for Douglas Fir; assume PM10 = 100% PM
	VOC	0.5	lb/mbf	Oregon DEQ Permit Application Guidance AQ-EF02 (4/25/00); based on NCASI study for Douglas Fir; reported as carbon
	HAP (total)	0.005	lb/mbf	OAPCA emission factor; assumes 1% of VOC (Table 4-2)
MP	PM	Calculated	lb/ton	AP42 (1/95) Section 13.2.4, Equation (1)
	PM10	Calculated	lb/ton	AP42 (1/95) Section 13.2.4, Equation (1)
LY	PM	760	lb/(acre-yr)	AP42 (10/98) Section 11.9, Equation (1); converted to lb from tons by multiplying by 2000
	PM10	380	lb/(acre-yr)	AP42 (10/98) Section 11.9, Equation (1); converted to lb from tons by multiplying by 2000; assume PM10 = 50% PM
PR	PM	Calculated	lb/vmt	AP42 (10/02) Section 13.2.1, Equation (2)
	PM10	Calculated	lb/vmt	AP42 (10/02) Section 13.2.1, Equation (2)
UR	PM	Calculated	lb/vmt	AP42 (9/98) Section 13.2.2, Equation (2); includes unpaved roads and log yard traffic
	PM10	Calculated	lb/vmt	AP42 (9/98) Section 13.2.2, Equation (2); includes unpaved roads and log yard traffic

**Table 4-2 Emission Factors for Individual Hazardous Air Pollutants (HAPs)<sup>2</sup>**

EU ID #	Pollutant	EF	Units
RSB-1, RSB-2	Acetaldehyde	9.6E-004	lb/mlb steam
	Acetophenone	3.7E-009	
	Acrolein	4.6E-003	
	Benzene	4.8E-003	
	bis(2-Ethylhexyl)phthalate	5.4E-008	
	Carbon tetrachloride	5.2E-005	
	Chlorine	9.1E-004	
	Chlorobenzene	3.8E-005	
	Chloroform	3.2E-005	
	2,4-Dinitrophenol	2.1E-007	
	Ethylbenzene	3.6E-005	
	Formaldehyde	5.1E-003	
	Hydrogen chloride	2.2E-002	
	Naphthalene	1.1E-004	
	4-Nitrophenol	1.3E-007	
	Pentachlorophenol	5.9E-008	
	Phenol	5.9E-005	
	Propionaldehyde	7.0E-005	
	Styrene	2.2E-003	
	2,3,7,8-Tetrachlorodibenzo-p-dioxins	9.9E-012	
	Toluene	1.1E-003	
	2,4,6-Trichlorophenol	2.5E-008	
	Vinyl Chloride	2.1E-005	
	o-Xylene	2.9E-005	
	Antimony	9.1E-006	
	Arsenic	2.5E-005	
	Beryllium	1.3E-006	
	Cadmium	4.7E-006	
	Chromium, total	2.4E-005	
	Cobalt	7.5E-006	
	Lead	5.5E-005	
	Manganese	1.8E-003	
	Mercury	4.0E-006	
	Nickel	3.8E-005	
	Selenium	3.2E-006	

<sup>2</sup>Values shown are uncontrolled. Note that it is also possible that this facility may emit other HAPs that have not yet been identified and for which emission factors have not yet been developed.

EU ID #	Pollutant	EF	Units
DP	Acetaldehyde	1.29E-003	lb/hr
	Acrolein	1.56E-004	
	Benzene	1.57E-003	
	1, 3-Butadiene	6.58E-005	
	Formaldehyde	1.98E-003	
	Naphthalene	1.43E-004	
	Propylene	4.34E-003	
	Toluene	6.86E-004	
	Xylenes	4.80E-004	
PP-1, PP-2	Acetaldehyde	0.0042	lb/msf (3/8")
	Formaldehyde	0.0019	
	Methanol	0.14	
	Methyl ethyl ketone	0.00087	
	Methyl isobutyl ketone	0.00071	
	Phenol	0.0014	
VT	Acetaldehyde	0.00081	lb/msf (3/8")
	Formaldehyde	0.00034	
	Methanol	0.0087	
	Phenol	0.0019	
LV	Acetaldehyde	0.0047	lb/msf (3/8")
	Methanol	0.0073	
VD-1, VD-2	Acetaldehyde	0.017	lb/msf (3/8")
	Acrolein	0.0013	
	Benzene	0.00059	
	Formaldehyde	0.0153	
	Methanol	0.049	
	Methyl isobutyl ketone	0.0069	
	m,p-Xylenes	0.00165	
	Phenol	0.0096	
	Propionaldehyde	0.0024	
	Toluene	0.0011	
	o-Xylenes	0.0014	
DK	Phenol	0.004	lb/mbf

**Table 4-3 Operational Parameters (OP) for Use in Emission Inventories**

EU ID #	Pollutant	Operational Parameter (OP)	OP Units
RSB-1	NOx	steam produced by boiler	mlb/yr
	VOC	steam produced by boiler	mlb/yr
	SO2	steam produced by boiler	mlb/yr
	PM	steam produced by boiler	mlb/yr

EU ID #	Pollutant	Operational Parameter (OP)	OP Units
	PM10	steam produced by boiler	mlb/yr
	CO	steam produced by boiler	mlb/yr
	Pb	steam produced by boiler	mlb/yr
	HAP	steam produced by boiler	mlb/yr
RSB-2	NOx	steam produced by boiler	mlb/yr
	VOC	steam produced by boiler	mlb/yr
	SO2	steam produced by boiler	mlb/yr
	PM	steam produced by boiler	mlb/yr
	PM10	steam produced by boiler	mlb/yr
	CO	steam produced by boiler	mlb/yr
	Pb	steam produced by boiler	mlb/yr
	HAP	steam produced by boiler	mlb/yr
CC-1	PM	material mass passed through cyclone	dry tons/yr
	PM10	material mass passed through cyclone	dry tons/yr
CC-2	PM	material mass passed through cyclone	dry tons/yr
	PM10	material mass passed through cyclone	dry tons/yr
CC-3	PM	material mass passed through cyclone	dry tons/yr
	PM10	material mass passed through cyclone	dry tons/yr
CC-4	PM	material mass passed through cyclone	dry tons/yr
	PM10	material mass passed through cyclone	dry tons/yr
CC-5	PM	material mass passed through cyclone	dry tons/yr
	PM10	material mass passed through cyclone	dry tons/yr
CC-6	PM	material mass passed through cyclone	dry tons/yr
	PM10	material mass passed through cyclone	dry tons/yr
CC-7	PM	material mass passed through cyclone	dry tons/yr
	PM10	material mass passed through cyclone	dry tons/yr
DP	NOx	engine operating hours	hr/yr
	VOC	engine operating hours	hr/yr
	SO2	engine operating hours	hr/yr

EU ID #	Pollutant	Operational Parameter (OP)	OP Units
	PM	engine operating hours	hr/yr
	PM10	engine operating hours	hr/yr
	CO	engine operating hours	hr/yr
	HAP	engine operating hours	hr/yr
MH	PM	material mass handled for each process	tons/yr
	PM10	material mass handled for each process	tons/yr
DB	PM	log volume debarked in each debarker	mbf/yr
	PM10	log volume debarked in each debarker	mbf/yr
PP-1	PM	plywood volume pressed	msf/yr (3/8" basis)
	PM10	plywood volume pressed	msf/yr (3/8" basis)
	VOC	plywood volume pressed	msf/yr (3/8" basis)
	HAP	plywood volume pressed	msf/yr (3/8" basis)
PP-2	PM	plywood volume pressed	msf/yr (3/8" basis)
	PM10	plywood volume pressed	msf/yr (3/8" basis)
	VOC	plywood volume pressed	msf/yr (3/8" basis)
	HAP	plywood volume pressed	msf/yr (3/8" basis)
VT	PM	dry veneer volume produced	msf/yr (3/8" basis)
	PM10	dry veneer volume produced	msf/yr (3/8" basis)
LV	VOC	green veneer volume produced	msf/yr (3/8" basis)
	HAP	green veneer volume produced	msf/yr (3/8" basis)
VD-1	PM	veneer volume dried	msf/yr (3/8" basis)
	PM10	veneer volume dried	msf/yr (3/8" basis)
	CO	veneer volume dried	msf/yr (3/8" basis)
	VOC	veneer volume dried	msf/yr (3/8" basis)
	HAP	veneer volume dried	msf/yr (3/8" basis)
VD-2	PM	veneer volume dried	msf/yr (3/8" basis)
	PM10	veneer volume dried	msf/yr (3/8" basis)
	CO	veneer volume dried	msf/yr (3/8" basis)
	VOC	veneer volume dried	msf/yr (3/8" basis)

EU ID #	Pollutant	Operational Parameter (OP)	OP Units
	HAP	veneer volume dried	msf/yr (3/8" basis)
DK	VOC	lumber volume dried	mbf/yr
	HAP	lumber volume dried	mbf/yr
MP	PM	material mass placed on pile	tons/yr
	PM10	material mass placed on pile	tons/yr
LY	PM	exposed log yard acreage	acres
	PM10	exposed log yard acreage	acres
PR	PM	vehicle miles traveled per vehicle	VMT/yr
	PM10	vehicle miles traveled per vehicle	VMT/yr
UR	PM	vehicle miles traveled per vehicle	VMT/yr
	PM10	vehicle miles traveled per vehicle	VMT/yr

#### 4.3 Potential to Emit (PTE) for CIPV

As described above, CIPV's potential to emit (PTE) air pollutants is based on information in their original application (and in several revised submittals) and on EPA review of CIPV's emission inventories. CIPV's PTE is presented below in Table 4-4 and reflects the emission factors presented in Tables 4-1 and 4-2. PTE means the maximum capacity of CIPV to emit any air pollutant (criteria or HAPs) under its physical and operational design. Any physical or operational limitation on the maximum capacity of CIPV to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, may be treated as part of its design if the limitation or the effect it would have on emissions is enforceable by EPA. PTE is meant to be a worst case emissions calculation and is used in many, though not all, cases to determine the applicability of federal requirements. Actual emissions may be much lower than PTE. For example, all of the emission estimates in Table 4-4 are based on 24-hours per day operation of the facility whereas the CIPV facility does not normally operate 24 hours per day. The only exception to that is the fire water pump (DP), which is only operated when needed for a fire or during periodic testing, much less than 500 hours per year. Consistent with EPA policy, the fire water pump PTE was estimated assuming 500 hours of operation (Seitz, Calculating Potential to Emit (PTE) for Emergency Generators, September 6, 1995).

**Table 4-4 Facility Potential to Emit for PSD , Title V, and MACT in Tons Per Year**

EU ID #	<b>Air Pollutants</b> NO <sub>x</sub> - oxides of nitrogen; VOC - volatile organic compounds; SO <sub>2</sub> - sulfur dioxide; PM - particulate matter; PM <sub>10</sub> - particulate matter with diameter 10 microns or less; CO - carbon monoxide; Pb - lead; HAP - hazardous air pollutants [see Clean Air Act, Section 112(b)]							
	NO <sub>x</sub>	VOC	SO <sub>2</sub>	PM	PM <sub>10</sub>	CO	Pb	HAP
RSB-1	145	11	16	38	55	393	<1	25
RSB-2	145	11	16	38	55	393	<1	25
CC-1				44	22			
CC-2				66	33			
CC-3				44	22			
CC-4				44	22			
CC-5				44	22			
CC-6				44	22			
CC-7				44	22			
DP	2	<1	<1	<1	<1	<1	<1	<1
PP-1		35		17	26			21
PP-2		11		5	8			6
VT		13						2
LV		2						2
VD-1		10		2	7	<1		<1
VD-2		10		2	7	<1		<1
DK		2		<1	<1			
<b>TOTAL</b>	<b>291</b>	<b>105</b>	<b>33</b>	<b>429</b>	<b>322</b>	<b>787</b>	<b>&lt;1</b>	<b>83</b>

#### 4.4 Fee Payments Based on Actual Annual Emissions

CIPV is required to pay fees annually based on an emissions inventory of its actual emissions for the preceding calendar year (See permit terms IX and X). As discussed above, EPA has documented methods, techniques, and assumptions that EPA believes provide the most accurate basis for estimating emissions from the facility, including actual emissions for fee purposes. The techniques in Section 4.2 above should be used to calculate annual emissions for fee purposes, unless CIPV has other information showing why another technique more accurately represents its emissions.

EPA notes that CIPV has an ongoing obligation to assure that all data in its application is

correct and to notify EPA of any errors or omissions (See permit term IX.A.2). Moreover, CIPV is required to certify to the accuracy and completeness of all data submitted to EPA, including the accuracy of its annual emission inventory for fee purposes.

## **5 Applicable Requirements Analysis**

A facility, or source, located in Indian Country may be subject to federal or tribal air quality regulations, but generally is not subject to state air quality regulations. The Colville Tribes have enacted an "Interim Control Ordinance to Regulate the Construction/Operation of Air Emission Sources at the Colville Indian Veneer Plant" and have issued a Construction Permit to CIPV under the Interim Control Ordinance. The Colville Tribes have not, however, gone through the process of obtaining authorization to be treated in the same manner as States under 40 CFR §§ 49.6 and 49.7 (the Tribal Authority Rule) and obtaining approval of air quality regulations as a "Tribal Implementation Plan." Therefore, the Interim Control Ordinance and the Construction Permit are not federally enforceable, do not meet the definition of "applicable requirement" under 40 CFR Part 71, and are not included in CIPV's Part 71 permit. EPA encourages and will work closely with all tribes wishing to develop Tribal Implementation Plans for approval under the Tribal Authority Rule.

EPA recognizes that, in some cases, sources of air pollution located in Indian Country are subject to fewer requirements than similar sources located on land under the jurisdiction of a state or local air pollution control agency. To address this regulatory gap, EPA is in the process of developing national regulatory programs for preconstruction review of major sources in nonattainment areas and of minor sources in both attainment and nonattainment areas. These programs will establish, where appropriate, control requirements for sources that will be incorporated into Part 71 permits. To establish additional applicable, federally-enforceable emission limits, EPA Region 10, in consultation with Tribes and other stakeholders, has proposed a Federal Implementation Plan (FIP) that will establish federal requirements for sources in Indian Country within Region 10. See 67 Federal Register 51802 (August 9, 2002); 67 Federal Register 11748 (March 15, 2002). EPA hopes to take final action on the proposal within the next year. EPA intends that its federal regulations created through a FIP will apply only in those situations in which a tribe does not have an approved Tribal Implementation Plan

- 5.1 Applicable Requirements: Based on the information provided by the source in their application and EPA's analysis of that information, CIPV is subject to the following requirements (see section II and IV of the permit) for the reasons explained:
  - 5.1.1 Chemical Accident Prevention Program - 40 CFR Part 68: The Chemical Accident Prevention Program requires sources who use or store regulated substances above a certain threshold to develop plans to prevent accidental releases. Based on information in their application, CIPV has no regulated substances above the threshold quantities in this rule and therefore is not currently subject to the requirement to develop and submit a risk management plan. However, this requirement is included in the permit as an applicable

requirement because CIPV has an ongoing responsibility to submit a risk management plan IF a substance is listed that CIPV has in quantities over the threshold amount or IF CIPV ever increases the amount of any regulated substance above the threshold quantity. Including this term in the permit minimizes the need to reopen the permit if CIPV becomes subject to the requirement to submit a risk management plan.

- 5.1.2 Stratospheric Ozone and Climate Protection - 40 CFR Part 82: The stratospheric ozone and climate protection program requires sources that handle regulated materials to meet certain procedural and certification requirements. Based on information in their application, CIPV has equipment that use or contain chlorofluorocarbons (CFCs) and other materials regulated under this program. All air conditioning and refrigeration units must be maintained by certified individuals, and according to their application, CIPV uses certified contractors.
- 5.1.3 NESHAP - 40 CFR Part 61, Subpart M - Demolition or Renovation Activity: The asbestos demolition and renovation program requires sources that handle asbestos-containing materials to follow specific procedures. Based on information in their application, CIPV has at least one area with asbestos-containing materials: the old boiler house. This area has been discontinued from normal use and production operations pending further cleanup operations. CIPV is not currently engaged in the activities regulated under this provision; however, IF CIPV conducts any demolition or renovation activity, they must assure that the project is in compliance with the federal rules governing asbestos including the requirement to conduct an inspection for the presence of asbestos. This requirement is in the permit to address any demolition or renovation activity at the facility.
- 5.1.4 Prevention of Significant Deterioration (PSD): PSD requires major new or modified sources, built after 1978, to go through a rigorous pre-construction review and approval process. CIPV is a "major" source for PSD purposes because its potential to emit one or more pollutants is greater than 250 tons per year (see Table 4-4); however, the facility was built before the 1978 applicability date for PSD. Because CIPV is an existing "major" PSD source, it will become subject to PSD permit requirements if any physical change or change in the method of operation of the facility increases the actual emissions, as defined in 40 C.F.R. 52.21, of any pollutant greater than the significant levels given below.

The PSD SER values (tons per year) for each PSD pollutant are as follows: Particulate Matter (PM) 25; Fine Particulate (PM<sub>10</sub>) 15; Sulfur Dioxide (SO<sub>2</sub>) 40; Nitrogen Oxide (NO<sub>x</sub>) 40; Volatile Organic Compounds (VOC) 40; Carbon Monoxide (CO) 100; Lead 0.6; Fluorides 3; Sulfuric Acid Mist 7; Hydrogen Sulfide (H<sub>2</sub>S) 10; Total Reduced Sulfur Compounds (TRS) - including H<sub>2</sub>S 10; Municipal Waste Combustor (MWC) acid gases 40; MWC metals 15; MWC organics  $3.5 \times 10^{-6}$ ; Municipal Solid Waste Landfills - Non-Methane Organic Compounds 50; and, Chlorofluorocarbons (CFCs) and Halons (any emission rate).

As discussed in section 3.4, the addition of a new dryer in 1996 was subject to PSD. The

addition of the two new indirectly-heated dryers (VD-1 and VD-2) would have also been subject to PSD if the potential to emit of the new dryers were not limited to less than the SER thresholds. The emission limits and required control system in this permit, explained in 5.1.5 below, limits emissions from the new dryers below the SER thresholds so the facility is not subject to PSD. Aside from these two projects, EPA has not received sufficient information to conclude PSD applicability for other changes that may have occurred at the facility, so no enforcement or permit shield is implied or granted.

**5.1.5 Owner-Requested Emission Limits for New Veneer Dryers (VD-1 and VD-2):** As explained in sections 3.4 and 5.1.4, CIPV proposed emission limits for the new dryers in order to avoid PSD permitting requirements. Section III of the permit contains the emission and operational limits, as well as the testing, monitoring, record keeping and reporting requirements that will ensure the dryers are in compliance. This section explains those requirements.

**5.1.5.1 Emission and operational limits:** The veneer dryer emission limits that are established by the permit are based on general emission factors for veneer dryers combined with assumptions about the expected control efficiency of the control system. The veneer dryer emissions are controlled by routing the veneer dryer emissions through the combustion chambers of the hogged-fuel boilers. Each boiler exhaust is controlled by a multiclone followed by a wet scrubber. The veneer dryer emission control system is therefore considered to be the entire boiler-multiclone-wet scrubber system. Testing of the previously installed direct-fired veneer dryers documented an emission reductions of approximately 95% in PM and VOC emissions, using the same control system. The emission limits proposed by the permittee assume only 92.5% control (reduction) of PM, PM10 and VOC. Emission testing, required by the permit, will verify whether the control system is as efficient as assumed. The limits are as follows:

<b>Pollutant</b>	<b>Daily Emission Limit (lb/day)</b>	<b>Annual Emission Limit (tons/year)</b>
PM	20.8	3.8
PM10 (including condensible PM10)	79.5	14.5
VOC (as THC minus methane <sup>1</sup> plus methanol <sup>2</sup> & formaldehyde <sup>3</sup> )	109	19.9

It is important to note that the emission limits apply to the new dryers that vent through the boilers, but do not apply to the boilers when the dryers are not operating. As explained below, there are no applicable requirements that apply to the boilers by themselves. It is also important to note that the emission limits in the permit are

different from those proposed by the permittee. The predicted emissions were modified by EPA to better reflect the emission factors that are available, resulting in the PM emission limit to be reduced and the PM10 emission limit to be raised, but remain under the threshold for PSD applicability. See section 4 above for more details on the changes to the emission inventory.

In order to measure the emission increase caused by the dryers, testing of the boilers with and without dryer emissions will be performed. Because the permittee requested the ability to route veneer dryer emissions to either one boiler or both boilers, emission testing is also required for either configuration. The measured boiler emissions (without the dryers venting to the boilers) will form a baseline which will be subtracted from the emissions measured while the dryers vent to the boilers to determine the contribution caused by the veneer dryers. Emission factors (lb/msf of veneer dried) will be developed by dividing the veneer dryer contribution (lb/hr emission rate) by the veneer dryer production rate during the test (msf/hr dried). This emission factor is in turn used to calculate daily and annual emissions based on daily and annual production. The annual emission limit is a 12 month rolling average which will be recalculated each month (for the preceding 12 months).

In order to ensure compliance with the emission limits, the permit requires all of the dryer emissions to vent through the boilers' combustion chambers, multiclones and wet scrubbers at all times and while the boilers, multiclones and wet scrubbers are operational. The dryer emissions are mainly composed of organic volatiles (VOC) and organic particulates (PM and PM-10) along with a minor amount of inorganics (PM and PM-10) as well as some HAP in the form of either volatiles or particulates, mostly organic in nature. The organics (including the HAPs) are expected to be destroyed in the combustion chambers or removed by the multiclones and wet scrubbers, consistent with the assumed control efficiency. The permit has been structured to allow venting the dryer emissions to one boiler or both boilers.

The permit requires emission testing to verify compliance with the emission limits and list the test methods that must be employed. The permit also establishes other operating restrictions which are derived from the emission tests and will help ensure that the facility is meeting the emission limits. Boiler exhaust oxygen, temperature and opacity is limited to ensure good boiler operation and good organics destruction. The temperature and oxygen levels in the boiler exhaust will be limited to the lowest values measured during the emission tests. Lower temperature and oxygen values may indicate less efficient combustion efficiency and therefore higher emissions. The opacity is restricted to 5% above the average opacity measured during the emission tests, allowing for variability which exists in the opacity measurement technique and minor swings in system performance. Opacity can be a good indicator of boiler, multiclone and wet scrubber performance and is related to particulate emissions levels. Wet scrubber pressure drop is restricted to the lowest levels recorded during the emission testing to ensure good operation and control of particulates that pass through the boiler combustion chamber and multiclone. The permit also restricts the dryer operating rates to those achieved during emission

testing, because it has not been demonstrated that the boilers can adequately destroy the emissions from the dryer at higher operation rates.

The permittee is required to record other parameters during the emission tests to establish a baseline for good operation. They include such things as hogged fuel moisture and ash content (which can affect the combustion efficiency and amount of PM and PM10 emissions from the boilers), veneer re-dry rates and specie of wood being dried (which reflects actual operating conditions and emission-generation rate during emission testing), and visual observations of gas leakage from the veneer drying system. This information is particularly valuable if future non-compliance problems must be evaluated. Subsequent to the emission tests, the permit will be reopened to incorporate certain operational restrictions that are based on the emission testing; however, the permittee must operate in accordance with the restrictions established through emission testing within 10 days after the testing is completed.

The permit requires ongoing monitoring and recordkeeping to ensure that the equipment continues to be operated and maintained as it was during emission tests that demonstrate compliance with the emission limits. In addition to the parameters that will be monitored during the emission tests, other monitoring and recordkeeping will be required. Grate cleaning in the boiler combustion chambers, which can cause significant short-term particulate emission increases, will be recorded to assist in the evaluation of possible opacity problems. The multiclone pressure drop, an indicator of performance and equipment condition, will be monitored and recorded. Use of the veneer dryer control system bypass, which is manually controlled, must be recorded. The entire veneer dryer system, including the dryers themselves and the control system, must be inspected for integrity to ensure emissions are not escaping the system uncontrolled.

All of the equipment that will be used to accomplish the monitoring must be kept in good operational condition. The permit specifies how to determine compliance with the emission limits by establishing emission factors from the emission test data based on the production rates during the tests. The emission factors are then multiplied by the actual dryer production rates (on a daily and monthly basis) to derive emission rates that can be compared against the limits in the permit to determine whether the facility is in compliance with the emission limits.

There is currently a continuous emission monitoring system (COMS) on each boiler exhaust, upstream of the wet scrubbers, that continuously monitor and record the opacity. Due to their upstream location, the COMS do not necessarily reflect what is being emitted from the stack after the gases have passed through the wet scrubbers. The permit requires opacity to be read using Reference Method 9 (RM 9), after it leave the stack, rather than relying on the COMS, because the RM 9 readings are expected to more closely relate to actual emissions from the stack. The information recorded by the COMS during the emission tests will be reviewed to determine whether it can be useful in predicting boiler performance. If the COMS data is determined to be useful, the permit may be modified to require the use of the COMS

data for ongoing compliance monitoring.

- 5.2 Non-applicable Requirements: Based on the information provided by the source in their application and by EPA's analysis, CIPV is not subject to the following requirements for the reasons explained.
- 5.2.1 NSPS - 40 CFR Part 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: This New Source Performance Standard applies to boilers with an heat input capacity larger than 100 mmBtu/hr and built, modified or reconstructed after June, 1984. The two wood-waste fired boilers are larger enough to be subject to this NSPS, but were constructed in 1974 and 1975, before the applicability cutoff date. CIPV asserts that no known modification or reconstruction of the boilers occurred after June, 1984, as those terms are defined in 40 CFR Part 60.2. Based on this information (i.e., that the subject boilers were built before the applicability date and were not modified or reconstructed after the applicability date), the boilers do not appear to be subject to this NSPS.
- 5.2.2 Compliance Assurance Monitoring Rule (CAM) - 40 CFR Part 64: CAM applies to emission units subject to an emission limit and with a pre-control potential to emit greater than the major source threshold defined in Part 71. However, only units with post control potential to emit greater than the major source thresholds must comply with CAM at initial permit issuance. All other units that meet the CAM applicability criteria must be in compliance at permit renewal and may also be required to submit a CAM plan if a significant change is made to the unit prior to renewal. Only the dryer emissions are limited and controlled; but the post-control emissions are not greater than the major source threshold. The dryers will be subject to CAM at permit renewal. None of the other emission units with post control potential to emit pollutants greater than the major source threshold are subject to an emission limit and they are therefore not subject to CAM at this time.
- 5.2.3 NESHAP - 40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (HAP) from Industrial, Commercial and Institutional Boilers and Process Heaters: This standard was proposed on January 13, 2003 (68FR6060) and is not expected to be finalized until 2004. As proposed, the CIPV boilers will be subject to this rule if the facility is a major facility for HAPs on the future effective date of the rule - that is if the facility has the potential to emit more than 10 tpy of any one HAP or more than 25 tpy as an aggregate of all HAPs. CIPV's November, 2002, application indicated that the facility will be major for HAPs because they have the potential to emit more than 25 tons per year of HAPs. If applicable, CIPV's permit will be reopened to add the new requirement within 18 months after the effective date of the rule if there are more than 3 years remaining before permit expiration.
- 5.2.4 NESHAP - 40 CFR Part 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants (HAP) from Plywood and Composite Wood Products: This standard was proposed on January 9, 2003 (68FR1276) and is not expected to be finalized until 2004. As proposed, the CIPV veneer and plywood operations will be

subject to this rule if the facility is a major facility for HAPs on the future effective date of the rule - that is the facility has the potential to emit more than 10 tpy of any one HAP or more than 25 tpy as an aggregate of all HAPs. CIPV's November, 2002, application indicated that the facility will be major for HAPs because they have the potential to emit more than 25 tons per year of HAP. If applicable, CIPV's permit will be reopened to add the new requirement within 18 months after the effective date of the rule if there are more than 3 years remaining before permit expiration.

5.2.5 NESHAP - 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (HAP) from Reciprocating Internal Combustion Engines: This standard was proposed on December 19, 2002 (67FR77829) and is not expected to be finalized until 2004. The rule will apply to engines that are 500 horsepower or greater in size. As proposed, the CIPV fire-water pump (IC engine) will not be subject to this rule because it is only 240 hp in size.

5.2.6 Endangered Species Act (ESA) Impacts: Under Section 7 of the ESA, 16 U.S.C. § 1531 et seq., EPA is obligated to consider the impact that a project may have on listed species or critical habitats. Based on the design (the new dryers do not produce a water discharge themselves) and low levels of air emissions that the new dryers will cause, combined with the fact that three existing, higher polluting dryers have been removed from operation, it is EPA's conclusion that the issuance of this Title V permit for CIPV, which allows the construction of the two new dryers, will not affect a listed species or critical habitat. Therefore, no additional requirements will be added to this permit for ESA reasons. EPA's "no effect" determination concludes EPA's obligations under Section 7 of the ESA. (See Endangered Species Consultation Handbook: Procedures for Conducting Consultation and Conference Activities Under Section 7 of the Endangered Species Act, FWS and NMFS, March 1998, at Figure 1).

## **6. Use of All Credible Evidence**

Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by the source and EPA in such determinations. See paragraph VIII.A.3 of the permit.

## **7. Public Participation**

### **7.1 Public Notice.**

As described in 40 CFR 71.11(a)(5), all Part 71 draft operating permits shall be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71.11(d). There is a 30 day public comment period for actions pertaining to a draft permit.

Public notice was given for this draft permit by mailing a copy of the notice to the permit

applicant, the affected state, the Tribal, city and county executives, and the local emergency planning authorities which have jurisdiction over the area where the source is located. A copy of the notice was also provided to all persons who submitted a written request to be included on the mailing list. Public notice was also published in a daily or weekly newspaper of general circulation in the area affected by this source.

## 7.2 Opportunity for Comment

A copy of the draft permit prepared by EPA, this statement of basis for the draft permit, the application, and all supporting materials submitted by the source were made available for public review at:

**Colville Indian Library**  
**Nespelem, WA 99155**  
**(509) 634-4711 x2791**

**Omak Public Library**  
**Box J**  
**Omak, WA 98841-0969**

Copies of the permit and statement of basis were also made available at no cost on EPA's web site [[www.epa.gov/r10earth/](http://www.epa.gov/r10earth/)] (once there, click on "Air"). All documents were made available for review at the EPA Region 10 Office indicated below during regular business hours.

**U.S. EPA, Region 10 (OAQ-107)**  
**1200 6<sup>th</sup> Avenue**  
**Seattle, WA 98101**

No comments were received and no requests for public comment were made during the 30 day public comment period which lasted from May 8, 2003, to June 9, 2003.

## 7.3 Mailing List

If you would like to be added to our mailing list to be informed of future actions on this or other Clean Air Act permits issued in Indian Country, please send your name and address to EPA at the address listed in section 7.2 above.